Brighton & Hove City Council

Cabinet

Date: **17 September 2026**

Time: **10.30am**

Venue: **Council Chamber, Hove Town Hall**

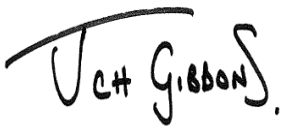
Members: **Councillors:** Sankey (Chair), Taylor (Deputy Chair), Alexander, Allen, Daniel, McGregor, Muten, Robins, Rowkins and Williams

Contact: **Raymond Bruce-Cathline**
Democratic Services Manager
01273 291058
raymond.bruce-cathline@brighton-hove.gov.uk

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Chief Executive
Hove Town Hall
Norton Road
Hove BN3 3BQ

Date of Publication - Wednesday, 9 September 2026

AGENDA

Part One **Page**

38 PROCEDURAL BUSINESS

(a) **Declarations of Interest:** Statements by all Members present of any personal interests in matters on the agenda, outlining the nature of any interest and whether the Members regard the interest as prejudicial under the terms of the Code of Conduct.

(b) **Exclusion of Press and Public:** To consider whether, in view of the nature of the business to be transacted or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

Note: Any item appearing in Part Two of the agenda states in its heading the category under which the information disclosed in the report is exempt from disclosure and therefore not available to the press and public.

A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls and online in the Constitution at Part 3E

39 MINUTES 9 - 32

To consider the minutes of the meeting held on 16th July 2026.

40 CHAIR'S COMMUNICATIONS

41 CALL OVER

42 PUBLIC INVOLVEMENT

To consider the following matters raised by members of the public:

(a) **Petitions:**
To receive any petitions presented by members of the public.

(b) **Written Questions:**
To receive any questions submitted by the due date of 12 noon on the 11th September 2026.

(c) **Deputations:**
To receive any deputations submitted by the due date of 10am on the 7th September 2026.

43 ISSUES RAISED BY MEMBERS

To consider the following matters raised by Members:

(a) **Written Questions:**
To consider any written questions

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Contact Officer: *Justine Harris*
Ward Affected: *All Wards*

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Contact Officer: *Steve Hook*
Ward Affected: *All Wards*

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Contact Officer: *Steve Hook*
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Ward Affected: *All Wards*

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Contact Officer: *Toni Manuel*
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Contact Officer: *Paul Nicholls*
Ward Affected: *Brunswick & Adelaide; Regency*

58 TARGETED BUDGET MANAGEMENT (TBM) 2026/27 MONTH 4 (JULY) **463 - 482**

Contact Officer: *Haley Woollard*
Ward Affected: *All Wards*

PART TWO

59 SEAFRONT LEASE: BRIGHTON WHEEL PROPOSAL (EXEMPT CATEGORY 3) **483 - 486**

Contact Officer: *Toni Manuel*
Ward Affected: *Kemptown*

60 UPDATE REPORT ON WESTERN ROAD RESURFACING WORKS AND RED ROUTE (EXEMPT CATEGORY 3) **487 - 508**

Contact Officer: *Paul Nicholls*
Ward Affected: *Brunswick & Adelaide; Regency*

61 TARGETED BUDGET MANAGEMENT (TBM) 2026/27 MONTH 4 (JULY) (EXEMPT CATEGORY 3) **509 - 512**

Contact Officer: *Haley Woollard*
Ward Affected: *All Wards*

62 PART TWO PROCEEDINGS

To consider whether the items listed in Part Two of the agenda and decisions thereon should remain exempt from disclosure to the press and public.

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The closing date for receipt of public questions and deputations for the next meeting is 12 noon on the fourth working day before the meeting.

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- Sharp items e.g. knives (including Swiss army knives) scissors, cutlery and screwdrivers;
- Paint spray or similar items;
- Padlocks, chains and climbing gear;

- Items that make a noise (e.g. whistles, loud hailers, mega phones); and,
- Banners, placards and flags or similar items.

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- interrupts the proceedings
- acts in a way that impacts the proper and orderly conduct of the meeting

In the interest of order during a meeting, the Mayor/Chair may suspend or adjourn a meeting for any length of time they decide.

You must follow the Mayor's/Chairs direction, including any requests to sit down or stop acting in a way that disrupts the Council business.

In most meetings, there are no incidents and Council is not disturbed. We hope this continues so there is no need for the Mayor or any Chair of a meeting to take these actions.

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- You should proceed calmly; do not run and do not use the lifts;
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- Once you are outside, please do not wait immediately next to the building, but move some distance away and await further instructions; and
- Do not re-enter the building until told that it is safe to do so

BRIGHTON & HOVE CITY COUNCIL

CABINET

10.30am 16 JULY 2026

COUNCIL CHAMBER, HOVE TOWN HALL

MINUTES

Present: Councillor Sankey (Chair) Taylor (Deputy Chair), Alexander, Allen, Daniel, McGregor, Muten, Robins, Rowkins and Williams

PART ONE

19 PROCEDURAL BUSINESS

19a Declarations of interests

19.1 There were none.

19b Exclusion of the press and public

19.2 In accordance with Section 100A of the Local Government Act 1972 ("the Act"), the Committee considered whether the public should be excluded from the meeting during consideration of any item of business on the grounds that it is likely in view of the business to be transacted or the nature of the proceedings, that if members of the public were present during it, there would be disclosure to them of confidential information as defined in Section 100A (3) of the Act.

20 MINUTES

20.1 Resolved- That the minutes of the previous meeting held on 29 June 2026 be approved as the correct record.

21 CHAIR'S COMMUNICATIONS

21.1 The Chair provided their communications.

22 CALL OVER

22.1 All items on the agenda were reserved for discussion. Item 34 concerning Covenant on Plot 2 and 3 in West Saltdean was brought forward on the agenda and taken as the first substantive item.

23 PUBLIC INVOLVEMENT

(A) Petitions

There were none.

(B) Public Questions

23.1 The public questioner was not present to put their question on Item 27 - More recycling less waste

23.2 Jenni Lloyd read the following question:

Item 33 - Asset Strategy

As members should be aware, Friends of New England House nominated NEH as an Asset of Community Value in May, although we have yet to get a response and there is no mention of the nomination as pending either on BHCC's list of ACVs, or in the cabinet paper. What consideration has been made of the energy and expertise of the creative community in formulating the options and the potential for a community-led redevelopment of the building, similar to that of the successful Observer Building in Hastings, and enabled by the new Community Right to Buy established in the Devolution & Community Empowerment Act 2026?

23.3 Cllr Taylor provided the following reply:

A successful application to list New England House as an Asset of Community Value [ACV] would grant the nominating group a 6-month period from accreditation to make the first offer for purchase of the site

The ACV application is pending and is now included in the ACV list on the council's website. Since the temporary closure of New England House, officers have been considering options to directly retrofit or redevelop the site, and we have not actively sought offers to purchase the site.

As a direct retrofit or redevelopment by the council is not financially feasible, this report seeks a decision to dispose of the site and begin active engagement with external organisations. Since deciding to close the building we have acknowledged all proposals from outside organisations in relation to New England House and have supported requests for information where possible.

We would welcome a direct discussion at any time with the Friends of New England House on their proposals, but we not been contacted by them and were not aware of the group's existence before being notified of an ACV application.

23.4 Alex Morisson read the following question:

Item 33 - Asset Strategy

The City Deal's flagship proposal is to renovate and expand New England House, the centrepiece of Brighton's creative-tech cluster, and to establish the surrounding area as Tech City South. This investment will provide the flexible space, infrastructure and connectivity that Brighton's most exciting businesses need to grow, while nurturing a new wave of entrepreneurs and business models. It will also put Brighton on the map as

one of the UK's most important tech clusters, one which operates on an international stage.

BHCC committed in the City Deal to a project budget for renovation of New England House of £24.53m made up of £4.9m from City Deal plus £9.8m from the council and £9.8m from the private sector.

How will this further decision, i.e. to abandon the New England House element of the City Deal, be communicated to the relevant parties and what will become of the £4.9m grant that sits in the council's accounts?

23.5 Cllr Taylor provided the following reply:

In 2014, a City Deal for the Greater Brighton City Region was agreed with government to be put towards the refurbishment and expansion of NEH to create a 'technical hub' for the South-East area. The planned project needed a total investment of £24.53m, which in addition to the £4.9m grant from government, would also require £9.8m from the private sector and £9.8m from the council.

The conditions of the grant were that it was used for capital expenditure. The council put the £4.9m government grant into our Capital Investment Programme in 2014/15 and the money spent on the refurbishment project was funded through capital reserves and borrowing over subsequent years.

Following the closure of NEH in September 2025, and pending decisions on its future, the refurbishment project's budget was reallocated to cover costs related to closure, safety mitigations, compensation for businesses and preparation for the next steps.

There is currently no requirement to report the outcomes of the City Deal to government, but the council has acted in accordance with the grant conditions at all times when spending the funding.

(C) Deputations

23.6 Paul Roughsedge presented the Deputation concerning Covenant on Plot 2 and 3 in West Saltdean

23.7 Councillor Taylor provided the following response:

Paul. I thank you for your deputation, which is a very eloquent deputation, and thank you for the briefing that you sent, which I've read and I know cabinet members have read. If you just take a step back, the report is a slightly strange report for a couple of reasons. In that ordinarily it wouldn't be a cabinet report, but because we like Council officially and Councillor Earthey so much, we agreed to the nom and to your representations to make it a cabinet report. I think also, you know, cabinet reports, you know, generally set out recommendations and so perhaps the very nature of having a cabinet report has pushed it in the direction somewhat of a recommendation. However, that said,
Well, two things. I think the report does substantively respond to the norm, although I understand, you know, your view and Councillor officially view that sections of it may not have been as you expected or hoped for, but I think substantially it does respond to the

norm and try to set out the considerations, the process, timelines are difficult because that's sort of subject to other things out of control, but it broadly does do that. However, I think the really important thing is that the recommendation in the report doesn't agree or recommend to revoke the covenant. What it does say is that council proposes not to seek to take over the land at this time, which I think is an important distinction. Now, as you pointed out in your submission, there is a live planning application on plot 2 for which the planning policy team have suggested that it is not recommended to proceed. Now, it's still live and we wait to see what the Office of recommendation is, but I know that the planning policy team often is given a high amount of weight in planning. So I think let's see what happens with that planning application. I'll address a few more of the points substantively in the report that we will come to 1st on the agenda. But I think to be clear, we have not revoked and ruled out fully the option to invoke. Let's see what happens with the planning application and I think there's more to come. I absolutely commit via also with Councillor Rowkins to work with you as the group and ward councillors on the matter.

23.8 **Resolved-**

1) Cabinet agreed to note the deputation.

24 ISSUES RAISED BY MEMBERS

24.1 A copy of the questions received was circulated ahead of the meeting. Responses provided both at the meeting and in writing are as follows:

1. Cllr Anne Meadows - 27. More recycling, less waste

6 new managers at a cost of £344,000 are being hired to look after 17 new staff. Surely the focus should be on front line staff. Paragraph 4.4 mentions there is scope to use existing assets to support future delivery - why are so many middle managers required?

Response: Cllr Rowkins

Nowhere in the report does it state that 6 new managers would be tasked solely with looking after 17 new staff. There are new frontline staff included in the recommendations, but we also need additional operational management resource to improve the service. The current ratio of operations management to collection staff is on average 1 Manager to 40 staff.

2. Cllr Alistair McNair - 27. More recycling, less waste

Will any of these new managers be employed to respond to residents queries e.g. on the phone?

Response: Cllr Rowkins

The focus of these roles is to improve the day-to-day service that residents receive and reduce the number of missed collections. That, in turn, will reduce the number of contacts made my email and phone, allowing better response times.

We will also continue to make improvements to the website and real time information available to residents.

3. Cllr Anne Meadows - 27. More recycling, less waste

Why is the lack of responsive website not a priority for extra funding?

Response: Cllr Rowkins

The focus of this funding is to improve the performance of the collections. Improvements to the website do not necessarily require such investments, and are being progressed alongside.

4. Cllr Alistair McNair - 27. More recycling, less waste

How confident are you that rubbish can be collected every fortnight without fail?

Response: Cllr Rowkins

No decision has yet been made on potential changes to the frequency of collections. If kerbside refuse collections were to switch to fortnightly in the future, we would want to guarantee that the bins would be collection as planned (or collected quickly in the event of a missed collection). That is the basis for the modeling work, and we will consider all of this before any final decision is made.

5. Cllr Alistair McNair - 27. More recycling, less waste

Is a 5% improvement in recycling a) guaranteed and b) enough of an increase to warrant cutting residents' rubbish collections?

Response: Cllr Rowkins

5% is not guaranteed - it may be higher. No decision has yet been made on the future collection model for kerbside refuse. The latest available data on waste volumes and recycling rates will be considered as part of any future decision.

6. Cllr Anne Meadows - 28. Proposed changes to Hove Park School

Despite so much consultation, 63% of residents were still opposed to moving to one school site. Has anything been identified in how the consultation was conducted to explain the lack of change in opinion?

Response: Cllr Taylor

The second consultation used the same methodology as the first, including online and paper responses, drop-in sessions and direct engagement with parents and residents, and was independently analysed thematically. That analysis shows the level of opposition (63%, compared with 60% in the first round) has remained broadly consistent because respondents' underlying concerns are about the detail of implementation – particularly the location of the 3G pitch, traffic and parking, and SEND provision – rather than opposition to the principle of consolidation itself. Nothing in the analysis points to any aspect of how the consultation was

conducted as an explanation for this. The plans have in fact been revised in response to feedback, including further work on pitch location, traffic mitigation and the School Travel Plan, and the Equality Impact Assessment has been strengthened accordingly. The Council recognises the strength of feeling reflected in the responses; however, consultation is one input into a decision that must also weigh educational need, SEND sufficiency and long-term sustainability of provision, which is why the proposal is recommended to proceed alongside a clear set of mitigations.

7. Cllr Anne Meadows - 28. Proposed changes to Hove Park School

Why are there no mitigations given to residents' concerns outlined in 3.7? Is the consultation just a tick box exercise considering that 63% of residents are opposed yet the move is still going ahead?

Response: Cllr Taylor

The consultation has directly shaped the mitigations set out elsewhere in this report and its appendices, including the draft School Travel Plan addressing journey changes and transport costs, strengthened SEND and pastoral commitments for the consolidated site, and further consideration of 3G pitch siting in response to concerns about noise, light and proximity to homes, to be finalised through the planning process. These are not detailed at paragraph 3.7 itself because that paragraph summarises the concerns raised; the corresponding mitigations are addressed in the Analysis and Equalities sections of the report. This is not a tick-box exercise: every response has been read, thematically analysed and reported transparently, and has visibly influenced the proposals since the first round. However, the Council does not consider that a majority against a proposal automatically requires it not to proceed – Cabinet must balance consultation responses against the educational case, SEND sufficiency and sustainability of provision across the city, and has concluded that consolidation, with the mitigations set out, remains the right way forward.

8. Cllr Anne Meadows - 28. Proposed changes to Hove Park School

Why can't the community have a say in the development of the land (paragraph 3.14)?

Response: Cllr Taylor

The disposal of the Valley Campus will follow the Council's standard property disposal process, and any future development of the site will require a separate planning application. That planning application – covering matters such as scale, layout, design and environmental impact – is subject to its own statutory public consultation under the Town and Country Planning regime, at which point residents and this Council will have a formal opportunity to comment on the specific development proposed. This report and decision relate only to the consolidation of the school and the principle of disposal, they do not fix the detailed design of any future development. Similarly, the final siting of the 3G pitch at the Nevill Campus remains subject to further engagement with

neighbouring residents and to planning consent, so there will be further opportunities for community input as these individual elements progress.

9. Cllr Anne Meadows - 28. Proposed changes to Hove Park School

Why is there no estimate of the money to be raised from the sale of the land?

Response: Cllr Taylor

A precise figure cannot be published at this stage because the site is still subject to Section 77 consent from the Secretary of State. Initial valuation advice has been received and this is included in Part 2 of the report. A more detailed valuation exercise is being undertaken. This will be informed by the massing study to confirm the extent of development possible under a planning policy compliant scheme. Valuations are often included in the part 2 report, given they are commercially sensitive and could impact on any future transaction.

The final receipt will depend on market conditions and any outcome from the planning approval process. Any disposal will be subject to the delegated decision process, requiring approval from the Director Property & Finance in consultation with the Cabinet Member for Finance and City Regeneration to approve terms and take any necessary steps to facilitate and complete the disposals of the properties identified and achieve best consideration. Once a sale has been agreed, the actual receipt will be reported through the Council's normal financial governance and reporting arrangements, including budget monitoring reports to Members.

10. Cllr Alistair McNair - 28. Proposed changes to Hove Park School

Will the money from the sale be ringfenced for educational purposes? Or swallowed up in the general fund?

Response: Cllr Taylor

The capital receipt from the disposal of the Valley Campus will be treated as a corporate capital receipt, as government regulations do not allow capital receipts to be used to support revenue budgets, and the Council's budget strategy requires that receipts support the corporate Capital Programme. It will not, therefore, sit outside normal corporate processes. However, it will not simply be absorbed into the general fund either: it is the Council's clear intention that a proportion of the receipt will be used to reimburse the High Needs Capital budget, which is being drawn upon to help fund Phase 1 of the works at the Nevill Campus, recognising that this programme is a SEND sufficiency project as much as a school reorganisation. Any wider application of the receipt will be subject to the Council's usual capital allocation process and Capital Strategy, and will be reported transparently through the Council's normal financial governance arrangements.

11. Cllr Anne Meadows - 31. Progress report about delivering our Housing Strategy

The report mentions that 51 Afghan families have been housed. How many local families exactly are awaiting to be housed in the city and what more can they do to ensure they are housed appropriately?

Response: Cllr Williams

There are 2812 families waiting on the Housing Register to be housed. This figure includes adult only families. The Local Authority is provided with funding to acquire properties for households under the Afghan Resettlement Scheme. Households are matched to available properties and further work may be undertaken to acquire private rented accommodation. The current acquisition plan for the next 3 years is to provide accommodation for 18 new households. Households do not reside in the city prior to nomination to a property and Local Authority is notified of households by the Home Office as required.

12. Cllr Anne Meadows - 31. Progress report about delivering our Housing Strategy

How many families have been on the waiting list for over two years or more?

Response: Cllr Williams

As at 13th July there are 1986 families on the Housing Register, waiting for a two or more bedroom property who have been on the Housing Register for two or more years.

13. Cllr Alistair McNair - 31. Progress report about delivering our Housing Strategy

What's the exact number of households on the housing register (para 3.17)?

Response: Cllr Williams

As at 13th July 2026 there were 5130 active households on the Housing Register.

14. Cllr Anne Meadows - 31. Progress report about delivering our Housing Strategy

3.19 mentions 51 homes 'have been made available for families'. Is this the same 51 homes made available for Afghan families mentioned in 3.16? It is not clear.

Response: Cllr Williams

3.19 mentions 51 homes 'have been made available for families'. Is this the same 51 homes made available for Afghan families mentioned in 3.16? It is not clear.

15. Cllr Anne Meadows - 31. Progress report about delivering our Housing Strategy

When downsizing, renting a three-bedroom house a tenant has occupied for many years may be cheaper for them than moving to a new one-bedroom flat. What is the council doing to mitigate the increased costs of downsizing?

Response: Cllr Williams

The Council provides a Transfer Incentive Scheme which specifically supports Council tenants downsizing to smaller properties. Residents who qualify the scheme are placed in Band A on the Housing Register and are able to access the following payments as set out in the Housing Allocation Policy:

- Downsizing by one bedroom £1,500
- Downsizing by 2 bedrooms £2,000
- Downsizing by 3 bedrooms £5,000
- Downsizing by 4 bedrooms £6,000
- Moving from a wheelchair-adapted property, even if the same size £1,500

The Under Occupation Officer with the Allocations Service and Rehousing Team provide additional support to residents who are downsizing. This can include home visits as well as support to bid and complete application forms. There is a also a streamlined process in place with the Revenue and Benefits team to apply for support removal costs.

16. Cllr Anne Meadows - 31. Progress report about delivering our Housing Strategy

It is council policy that all voids are used for temporary accommodation. There has also been an increase of 230 households (para 3.4) moving into Temporary Accommodation for this year. How long is this strategy expected to last?

Response: Cllr Williams

The use of council homes as temporary accommodation is a temporary measure, not a permanent policy. Cabinet agreed that selected empty council homes can be used as temporary accommodation until 1 May 2027, with a maximum of 180 properties and a range of exemptions and safeguards in place.

This approach was introduced because of the significant increase in homelessness and the high cost of emergency and nightly-paid accommodation. It is part of a wider programme to provide better quality accommodation for homeless households, reduce the use of expensive emergency accommodation, and improve financial sustainability.

The council is also investing in longer-term solutions, including preventing homelessness earlier, helping households move on more quickly, increasing council-owned temporary accommodation, and developing supported housing options.

Progress has been made so far. The latest programme update shows that 69 council voids have already been brought into use as temporary accommodation, with further properties in the pipeline, as part of the agreed target of 180 homes by May 2027.

17. Cllr Alistair McNair - 31. Progress report about delivering our Housing Strategy

3.33 mentions the progress with tenant perception of the service. How many residents actually responded to the survey? What is the total number of residents eligible to respond?

Response: Cllr Williams

Our STAR tenant perception survey is completed annually. The minimum required number of responses is 930 but we like to achieve more. As per good practice, we ensured that the profile of the respondents reflected the demographics of the population. They were based on Age Group, Tenure, Ward, Property Type and Property Ownership and the surveys were completed via a telephone call. 1,002 responses plus 48 incomplete surveys were achieved in our 2025/26 survey.

18. Cllr Anne Meadows - 32. Targeted Budget Management

Why wasn't the HRA overspend mentioned in the previous Housing Strategy report in 31 above?

Response: Cllr Taylor

The TBM report is produced regularly and published promptly so that officers and members can react as quickly as possible to emerging trends. This means that it may well have been drafted after other reports presented on the same day.

19. Cllr Anne Meadows - 32. Targeted Budget Management

How can the council afford to give Whitehawk £1 concessionary fares if concessionary fares have been identified as a risk e.g. the increased costs for Compass which have risen by a third?

Response: Cllr Taylor

Concessionary fares are funded by a mixture of Council revenue funding and Local Authority Bus Grant. Officers recommended a three-month pilot of a £1 targeted adult short hop bus fare in Whitehawk as an equalities-led place based intervention, due to not only the levels of deprivation in that ward but the widespread nature of it. Whitehawk is also a Pride in Place area, which means we are able to align the proposed pilot with wider place-based activity aimed at tackling deprivation and improving access to essential services, including affordable food shopping.

20. Cllr Anne Meadows - 32. Targeted Budget Management

The council is borrowing over £500m. At what figure is our debt deemed unmanageable, especially considering the further borrowing required to fund King Alfed, Withdean Swimming Pool and libraries?

Response: Cllr Taylor

In line with he Council's current financial situation, capital investment – especially large scale projects – undergoes rigorous scrutiny with business cases being reviewed by both the service and central finance to ensure that all additional borrowing required is able to be funded, preferably by the revenue streams generated by the project itself. In such cases, it means that the additional borrowing can be undertaken without adding strain to the Council's revenue budget. It is also worth noting that the large majority of borrowing is related to housing investment – i.e against secure, long-term, rent-yielding assets.

21. Cllr Anne Meadows - 33. Asset Strategy

£55m is quoted as the figure to be gained from properties and assets, but there is no ballpark figure for valley campus. There must be a valuation. What's wrong with the public knowing what the figure is?

Response: Cllr Taylor

Initial valuation advice has been received and this is included in Part 2 of the report. A more detailed valuation exercise is being undertaken. This will be informed by the massing study to confirm the extent of development possible under a planning policy compliant scheme. Valuations are often included in the part 2 report, given they are commercially sensitive and could impact on any future transaction.

22. Cllr Anne Meadows - 33. Asset Strategy

Why is no valuation provided for 1-3 Bond Street? Or for New England House? Would you agree that not providing at least ballpark figures for valuations risks a lack of confidence in the council's ability to sell competitively?

Response: Cllr Taylor

The valuation for 1-3 Bond Street was not available at the time of publishing the report. However, when received this will form part of the delegated decision approval process to comply with our duty to achieve best consideration.

The report sets out the viability challenges for the New England House site. Initial valuation advice is provided in Part 2 of the report. As part of the recommended approach, only at the point where there is a developed planning compliant scheme will it be possible to obtain a realistic detailed valuation for the site.

23. Cllr Hill - 32. Targeted Budget Management

Would you accept that part of the pressure on the care sector which has contributed to average unit cost of care being above budgeted levels is the government's increase of national insurance contributions? These costs are then passed onto people needing care and council taxpayers, with no compensation for councils and other public bodies that lose funding from this as initially promised. I would encourage the administration to use their power to lobby the government on this matter.

Response: Cllr Alexander

Yes, it is reasonable to recognise that increases in employer costs, including changes to National Insurance contributions, are one factor affecting the cost of providing care. However, the primary driver of higher unit costs of care is the complexity of need. Adult Social Care is supporting more people than budgeted for, and the average weekly cost of care is higher than the budget assumption. As from a political point of view. I have every faith that we will be seeing a reform of Adult Social Care coming from the Labour Government in the very near future. It is an area that Andy Burnham has long been passionate about. Andy Burnham reiterated his commitment earlier this month saying: 'It is urgent, the need to fix social care, and I personally would look at all of the implications of that in relation to inheritance tax and care charges. I wouldn't flinch from it.'

24. Cllr Hill - 32. Targeted Budget Management

Increasing complexity of need is also driving higher unit costs in social care. Can the cabinet member for adult social care detail provide detail on what she is doing to address the root causes behind the rise in these increasingly complex needs? A greater understanding of this is needed to move towards a prevention-based approach to adult social care.

Response: Cllr Alexander

Rising complexity of need is a significant factor in Adult Social Care pressures, particularly for working-age adults, but our focus is on preventing people from reaching crisis point and supporting them to remain independent for longer. The council's Adult Social Care Demand Management Programme is specifically designed to address the underlying drivers of demand through prevention, reablement, targeted reviews and reducing avoidable admissions into long-term care.

We are expanding our reablement offer, helping people recover independence following illness, injury or a hospital stay. Evidence shows that effective reablement can reduce the need for ongoing support, delay or avoid residential care, and improve outcomes for residents. We are also redesigning our Adult Social Care front door so that more residents can access information, advice, community support, technology-enabled care and voluntary sector services earlier before their needs escalate.

Alongside this, we are increasing reviews of existing care packages to ensure support remains proportionate to people's needs and focused on maximising independence. By working closely with NHS partners, providers, and the voluntary sector, we are strengthening prevention and early intervention across the health and care system. This approach improves outcomes for residents while reducing the growth in demand for more intensive and costly care services. Public Health is also in the process of a deep dive into how better to support the growing complexity of support needs in our city.

25. Cllr Fishleigh - 33. Asset Strategy

The land in West Saltdean identified for disposal is designated as Local Green Space in the West Saltdean Neighbourhood Plan and our community has told BHCC multiple times it wishes to maintain and rewind the plot, however, BHCC has not helped with getting access rights from the farmer BHCC proposes to sell part of the plot to. How would the anticipated future use affect the LGS and will you commit to negotiating access rights as a condition of the sale?

Response: Cllr Jacob Taylor

The land being considered for disposal would continue to be designated as Local Green Space and subject to the same strict restrictions as Green Belt land. We have historically tried to secure access for the Saltdean Climate Action Network (SCAN), however, this was not supported at the time by the owner of the track. Due to the access track not being in the Councils ownership, we cannot guarantee that we would be able to negotiate access rights as part of the disposal, but I want to give a firm commitment that we will attempt to secure this via negotaiton with the owner as part of any transaction.

26. Cllr Fishleigh - 34. Covenant on Plot 2 and 3 in West Saltdean

Do you think that the concerns of residents have been properly addressed in the report before you?

Response: Cllr Jacob Taylor

Residents concerns have certainly been considered through this process – albeit I accept that the recommedations in the rport may not be what residents were hoping for.

27. Cllr Fishleigh - 34. Covenant on Plot 2 and 3 in West Saltdean

Do you think that this report meets the requirements of the Notice of Motion?

Response: Cllr Jacob Taylor

Yes, becasue the report sets out the processes, legal considerations, likely costs and implications of invoking Clause 4 of the 1938 Agreement, with further detail on the legal advice provided in the (Exempt 3) Part 2 report.

It is not possible to provide precise timescales, as they would depend on matters outside the Council's control, including legal processes, negotiations with landowners and any ministerial approvals required.

28. Cllr Fishleigh - 34. Covenant on Plot 2 and 3 in West Saltdean

Do you accept what residents said that taking over the land doesn’t have to mean acquisition?

Response: Cllr Jacob Taylor

While residents have suggested that "taking over" the land does not necessarily require acquisition, the Council has obtained legal advice on the interpretation of Clause 4, which is contained in Part 2. The recommendations in the report have been made having regard to that advice.

29. Cllr Fishleigh - 27. More recycling less waste

Recycling, general waste and garden bins continue to be missed on a regular basis in Ovingdean, Rottingdean and especially West Saltdean. How can residents be confident that reducing collections will improve the reliability of the service?

Response: Cllr Tim Rowkins

No decision has yet been made on a future model of collection for kerbside refuse. The additional investement contained in the Cabinet report today seeks to improve the reliability of the service we currently have across all waste streams. However, the age of our fleet following years of underinvestment is a well-documented cause of missed collections. If the service were to switch to fortnightly, it would clearly enable us to retire some of the older vehicles. It would also enable us to build in more catch-up capacity, including spare crews during the day, as well as the PM crews, to which recruitment is difficult.

30. Cllr McLeay - 31. Progress report about delivering our Housing Strategy

The report states at paragraph 3.4 that the council has made progress with “developing Personal Emergency Evacuation Plans (PEEPs) with vulnerable tenants”. However, the new legal requirements for residential PEEPs in relevant higher-risk residential buildings came into force on 6 April 2026. Given the importance of these plans in protecting disabled and other vulnerable residents during a fire emergency, can the Cabinet Member please confirm whether all required PEEPs in relevant high-rise council housing have been completed in accordance with the legal requirements that came into force on 6 April 2026, and if not, how many remain outstanding and what is the timetable for completion?

Response: Cllr Williams

The council has made significant progress in implementing the requirements arising from the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025, which came into force on 6 April 2026. These regulations require landlords to use reasonable endeavours to identify residents who may need assistance to evacuate and to undertake person-centred fire risk assessments where required. The council has established dedicated arrangements to identify residents who may require support, including tenancy visits, resident engagement and the introduction of Personal Emergency Evacuation Plans across relevant higher-risk residential buildings. Progress is monitored through a dedicated fire evacuation tracking system and is subject to ongoing review as residents’ circumstances change.
As of this month, we have completed 82% of about 1000 residents who are eligible for a PEEP.

31. Cllr McLeay - 31. Progress report about delivering our Housing Strategy

Paragraph 3.4 repeats the claim made in the Cabinet report of 14 May 2026 that only "two high-risk fire safety actions" identified through FRAs remain outstanding across the entire council housing stock. However, during a recent visit to Theobald House, I observed a number of serious fire safety issues that appear to remain unresolved despite being identified in successive FRAs (carried over from 2024 and 2025 FRAs). Can the Cabinet Member therefore explain how the council determines whether an FRA action is recorded as "outstanding" in reports to Cabinet – specifically, if a serious or high-risk issue identified in an FRA has not yet been physically remediated, but has merely been placed into a future planned works programme, is that action counted as complete or outstanding for reporting purposes?

Response: Cllr Williams

If the councillor has not already done so, I would ask that she reports the issues that she identified to Housing.Firesafety@brighton-hove.gov.uk. This is a inbox which is regularly monitored by multiple officers to ensure that nothing is missed and everything is followed up.

An FRA action is not recorded as complete simply because it has been identified and included within a future programme of works. Actions remain open or outstanding until the council is satisfied that the required risk mitigation has been implemented and verified through the relevant compliance processes. Where works are programmed, they continue to be tracked and reported as live actions until completion.

32. Cllr West - 27. More recycling, less waste

It is a pity that it has taken the Administration so long to find enthusiasm for fortnightly residual refuse collections, the benefits of which have long been widely understood. Over a decade ago previous iterations of this Administration blocked attempts to introduce both fortnightly collections and food waste collections. Given the limited size of the flimsy door-step food waste containers, which are already attracting the interest of clever foxes, and the considerable amount of food waste still going into residual waste, will containers now need to be replaced with bigger ones with better locks?

Response: Cllr Rowkins

The key thing not reflected in your question is sequencing. The rationale we have followed is that you only start to consider reducing the frequency of refuse collections once you have moved a significant amount of waste out of the bins and into recycling. Now that we have weekly food waste collections in place for every resident in the city, and also now accept a wider range of materials in our mixed recycling collections, the amount of waste in the refuse bins is falling, which in turn means it may not be the most efficient use of taxpayers' scarce resources to collect half empty bins every week. That said, we do need to see more data and continued improvements in the service before taking a decision.

On food waste bins, we are currently trialling an alternative unit with a different locking mechanism, which we may choose to deploy in some areas. I would add, however, that reports of foxes accessing the food waste bins are very limited – it does not appear to be a widespread problem.

33. Cllr West - 27. More recycling, less waste

It is refreshing to see the administration admit it hasn't done well enough with its management of waste and recycling over the past two years. Clearly a lot of work remains to be done to improve the reliability of collections to gain public confidence ahead of further major changes. It is a staggering admission of failure that a further investment of £1.3m is required to realise this. Do the administration wish to apologise for their incompetence?

Response: Cllr Rowkins

No. Investing in a crucial frontline services to make continued improvements is not an admission of failure – it's just good governance. We all know there is more work to do here, but really – incompetence? Taking on the recommendations of the KC report, cleaning up the culture, investing in vehicles, bringing in new crews in the evenings to catch up on missed collections, adding capacity to the workshop, digitising an operation that used to run on scraps of paper, providing real-time updates for residents, expanding our recycling? When I started going to the depot in 2023, crews said they hadn't seen a councillor in years. So how about instead you apologise to me for keeping the service at arms length for so long and handing over such a huge workload?

34. Cllr West - 33. Asset Strategy

It was hoped that with the development of the City Downland Estate Plan that the wide benefits of the public asset, the council holds in its trust, had finally been appreciated. I received clear assurances that the administration had no intention to sell land from the City Downland Estate, yet suddenly, without consultation, this is now proposed. There is no suggestion the proceeds of these land sales will even be reinvested within the estate. How do Labour care to explain their betrayal?

Response: Cllr Jacob Taylor

A clear part of the council's overall financial strategy – which is required to protect and invest in front-line public services – is to realise capital receipts where possible. The Council recognises the importance of the City Downland Estate and the City Downland Estate Plan. These pieces of land have been recommended for disposal as they are not seen as critical to existing agricultural holdings, and are mostly fragmented from the estate. These disposals form part of our ongoing work to ensure we are making best use of our assets now and for the long-term.

35. Cllr Barton Ahmad - 28. Proposed changes to Hove Park School

The reduced geographical spread of secondary school provision in proposed changes is concerning, and, as demonstrated in the consultation process, deeply unpopular. How will families in Portslade and West Hove be supported with the closure of the Valley campus, not least with the increased journey length and car travel? How will active travel be encouraged and facilitated for these families making the longer journey?

Response: Cllr Jacob Taylor

I think it's a shame that the Greens are seemingly opposing a proposal that has been brought forward by the governing baord and headteacher themselves. The Council recognises that consolidation onto the Nevill Campus will, for some families currently using the Valley Campus, mean a change in route, walking or cycling distance, or bus service, and that this could be a particular barrier for some families. This is why a School Travel Plan is being developed as part of the programme. It will map current and future journeys against home postcodes to identify the pupils most affected, including those travelling from Portslade and West Hove, and will target mitigations accordingly. This includes working with Brighton & Hove Buses on route capacity at school start and end times, identifying cycling and walking route improvements around the Nevill Campus, and providing clear information on eligibility for home-to-school transport assistance under the Council's policy, with particular attention to pupils eligible for free school meals, pupil premium or with an EHCP. This work will be finalised ahead of the September 2028 transition.

36. Cllr Sykes - 32. Targeted Budget Management

The new TBM reporting format is confusing. Please explain the colour coding in Directorate overview and Savings Mitigation and Transformation tables.

Response: Cllr Jacob Taylor

The new format aims to encourage greater accessiblity and engagement for readers who are less familiar with lengthy financial reports by enabling them to easily find and understand information on areas of interest. Each service area has been captured in a one page dashboard showing the forecast, the reasons for it, the mitigations in place, the progress against savings targets and any supporting data that would help to demonstrate the position or increase the understanding of the key drivers of it.

The overarching colour is that used on all of our corporate reports including performance reporting and the council plan.

The Red / Amber / Green RAG status is as you would expect on savings delivery with Green being on track and Red being flagged as a concern. The grey and blue statuses have been added to show "not yet fully planned" and "already achieved" respectively. It's a fair request, and a key will be added from TBM3. We would expect these savings numbers to move towards green as the year progresses but again, this level of transparency is designed to give a more rounded picture of the work being undertaken and the progress being made.

37. Cllr Sykes - 32. Targeted Budget Management

Appendix 2 sets out newly identified risks totalling £17.1m which add enormously to in-year budget pressure. Rather than risks, many of these seem to be actual pressures that have crystallised either following global events (fuel, utility costs), or a re-evaluation of actual projected pressures some of which have increased massively. This all rings numerous alarm bells high amongst which are confusing risk with actual pressure (due to the different management response required) and the extent of under projection of pressures for example in ASC. Or is this merely down to a new presentation of TBM?

Response: Cllr Jacob Taylor

When preparing their forecasts, the services have separated pressures that they feel are certain to happen without intervention, from risks which, while mitigations will be sought and acted upon, are not certain at the point of the forecast. In previous presentations of the report, a similar approach would have been taken but the risks would not have formed part of the published document. This risk table gives greater transparency to the forecasts and to the Council's financial position. As the year progresses, we would expect to see issues move to and from the risk table and between the risk table and the forecast as items are either escalated or removed. The inclusion of the information gives a more rounded view of the current financial situation and therefore greater context for decision making.

38. Cllr Barton Ahmad - 28. Proposed changes to Hove Park School

With the proposed disposal of the Valley campus, and building of a 3G pitch on the Nevill site (not to mention the increased car dependency), these plans have considerable environmental costs. These concerns are reflected by participants in the consultation. How will biodiversity loss and loss of green space be mitigated across both sites with these changes?

Response: Cllr Jacob Taylor

The Council recognises these important concerns. The 3G pitch at the Nevill Campus is intended in part to offset the loss of pitch capacity in an efficient way, within a smaller footprint, and its final siting remains under consideration. There is further engagement planned to minimise impact on neighbouring residents and habitats. As the works at the Nevill Campus and any future development of the Valley Campus progress to planning application stage, both will be subject to the normal planning requirements on ecology and, where applicable, biodiversity net gain under the Environment Act 2021, including appropriate surveys and mitigation or compensation measures. These matters will be considered fully as part of that statutory process.

39. Cllr Sykes - 29. Special Educational Needs and Disabilities (SEND) Sufficiency Plan 2026-2029

Regarding B&HCC's implementation of government guidance on the Minimum Funding Guarantee (MFG) as applied to all DSG blocks, what is the current position /interpretation across all blocks, how does this impact on SEND funding if at all and has the Schools Forum been involved in discussing the MFG over the past 3 years?

Response: Cllr Daniel

The minimum funding guarantee operates in the Schools Block for mainstream schools and the High Needs Block for special schools. For mainstream schools, the government's operational guidance allows LAs to set an MFG between minus 0.5% and 0.0% per pupil compared to the prior year baseline. This relates to each school's delegated budget and includes notional SEN funding. For 2026/27, Brighton and Hove set a MFG rate of 0.0% per pupil and this was agreed at the October 2025 Schools Forum. For special schools, the government's operational guidance states the MFG to be operated by local authorities for 2026/27 must be 0% using their schools' 2025/26 funding baseline. Schools in Brighton and Hove received a +1% uplift in their top-up funding rates and this was agreed following a report to Schools Forum in January 2026. Reports are provided to the Schools Forum on an annual basis to outline funding arrangements including the operation of the MFG.

40. Cllr Shanks - 30 Adolescent Strategy 2026 - 29

Can you guarantee that the money currently available for youth work through the collective will be kept the same or increased?

Response: Cllr Daniel

The expansion of youth work is funded from specific projects such a Young Futures and SkillMill. Both are 3 year programmes with specific criteria that we must meet to deliver youth work and that funding is secured for this time period. Beyond that time period it will very much depend upon future funding from central government and the outcomes achieved from the projects.
Regarding the existing youth work, this is planned to continue as part of our business as usual. There is a very clear intention from central government to invest in youth work and as per our Adolescent strategy the council is committed to this work and understands its value. However, we are all aware of the financial pressure the local authority is under and we must be fiscally responsible and review all budgets for non-statutory services annually. This will be the case for youth work, as it will for many other services.

41. Cllr Shanks - 29. Special Educational Needs and Disabilities (SEND) Sufficiency Plan 2026-2029

How will schools be supported to take on new roles for send children with limited budgets?

Response: Cllr Daniel

I would like to reassure schools that any new provision commissioned or developed as part of this proposal will be supported by funding to meet the associated staffing requirements. We recognise that schools cannot be expected to absorb additional staffing costs from existing budgets. Funding arrangements will therefore be designed to ensure that any new provision is appropriately resourced from the outset, enabling schools to focus on delivering high-quality support for children and young people without placing additional pressure on their core budgets. Alongside this, additional DfE funding to support the implementation of SEND reforms will include a Mainstream Inclusion Fund, provided directly to schools, and funding for Experts at Hand, giving all schools access to additional specialist support.

25 MATTERS REFERRED TO THE EXECUTIVE

25.1 There were none.

26 REPRESENTATIONS FROM OPPOSITION MEMBERS

26.1 Cabinet received a representation from Councillor Sykes on Item 32: Targeted Budget Management 2 (TBM).

27 MORE RECYCLING LESS WASTE

27.1 Cabinet considered a report concerning More Recycling Less Waste.

27.2 Councillors Allen, Taylor, Robinson, Muten, Robins, Sheard, and Sankey asked questions and contributed to the debate of the report.

27.3 Resolved-

1) Cabinet agreed to continue work to model and prepare for the introduction of a fortnightly residential kerbside residual waste collection model, with a view to implementation by July 2027, subject to operational readiness and a final decision being taken by Cabinet.

2) Cabinet agreed to the investment of £1.3M being made as set out in 3.16 below in order to improve the service in readiness for a change to fortnightly collections and to achieve the associated savings and efficiencies as detailed in this report.

28 PROPOSED CHANGES TO HOVE PARK SCHOOL

28.1 Cabinet considered a report concerning Proposed Changes to Hove Park School.

28.2 Councillors Muten, Robins and Daniel asked questions and contributed to the debate of the report.

28.3 Resolved-

1) Cabinet agreed to approve the consolidation of Hove Park School onto a single site at the Nevill Campus with effect from September 2028, subject to the completion of the necessary capital works.

2) Cabinet agreed to delegate authority to the Director Property and Finance, to:
- commission the Phase 1 and Phase 2 capital works at the Nevill Campus within the funding envelope

3) Cabinet noted that the Section 77 application in respect of the Phase 2 Internal remodelling and 3G artificial pitch will be submitted to the Secretary of State, and that final approval of Phase 2 will be confirmed on receipt of consent.

29 SPECIAL EDUCATIONAL NEEDS AND DISABILITIES (SEND) SUFFICIENCY PLAN 2026-2029

29.1 Cabinet considered a report concerning Special Educational Needs and Disabilities (Send) Sufficiency Plan 2026-2029.

29.2 Councillors Rowkins, McGregor and Robinson asked questions and contributed to the debate of the report.

29.3 Resolved-

1) Cabinet agreed to note the programme of new and expanded specialist provision set out in the latest draft SEND Sufficiency Plan 2026-2029 (attached at Appendix 1).

2) Cabinet agreed the programme of new and expanded specialist provision set out in the draft SEND Sufficiency Plan 2026–2029 and detailed in Section 3 of the report.

3) Cabinet noted that individual provisions set out in the draft Plan which require statutory processes — including prescribed alterations under the Education and Inspections Act 2006 — will be subject to separate decisions and public consultation in due course, and that this report does not itself authorise any such alteration.

30 ADOLESCENT STRATEGY 2026 - 29

30.1 Cabinet considered a report concerning Adolescent Strategy 2026 - 29.

30.2 Councillors Sheard, Taylor and McGregor asked questions and contributed to the debate of the report.

30.3 Resolved-

1) Cabinet approved the city's Adolescent Strategy 2026/29 and supports the activity detailed therein.

31 PROGRESS REPORT ABOUT DELIVERING OUR HOUSING STRATEGY

31.1 Cabinet considered a report concerning Progress Report About Delivering Our Housing Strategy.

31.2 Councillors Sheard, Alexander, Robinson, McGregor and Sankey asked questions and contributed to the debate of the report.

31.3 Resolved-

1) That Cabinet considered and noted the progress made towards the ambitions set out in the Housing Strategy 2024-29 and agrees actions to be undertaken in 2026-27 as set out at Appendix 1.

32 TARGETED BUDGET MANAGEMENT (TBM) 2026/27 MONTH 2 (MAY)

32.1 Cabinet considered a report concerning Targeted Budget Management (TBM) 2026/27 Month 2 (May).

32.2 Councillors Allen and Alexander asked questions and contributed to the debate of the report.

32.3 Resolved-

1) Cabinet notes the forecast risk position for the General Fund, which indicates a potential forecast overspend risk of £19.882m

2) Cabinet notes the additional risks of £17.131m included in the table at Appendix 2 which are not included in the forecast figure above.

3) Cabinet notes the forecast overspend risk for the separate Housing Revenue Account (HRA), which is an overspend of £0.482m.

4) Cabinet notes the forecast overspend risk for the ring-fenced Dedicated Schools Grant, which is an overspend of £6.643m in year resulting in a cumulative deficit of £8.405m.

5) Cabinet approves a request to MHCLG for additional EFS – which is additional borrowing, repaid by further capital receipts - in 2026/27 of up to £30m, to be drawn down if required and discussed in 3.10 below.

6) Cabinet notes the current RAG rating of the transformation workstreams at Appendix 3.

7) Cabinet notes the Treasury Management update at Appendix 4

8) Cabinet notes the Corporate Debtor position at Appendix 5

9) Cabinet approves the addition of new projects to the capital programme totalling £272k as set out in Appendix 6.
10) Cabinet notes the forecast position on the Capital Programme at Appendix 7 which shows budget variations of £4,283k.

11) Cabinet approves the capital budget variations of £6.672m and reprofiling of £8.328m set out in Appendix 7 and discussed at 3.16

33 ASSET STRATEGY

33.1 Cabinet considered a report concerning Asset Strategy.

33.2 Councillors McGregor, Allen, Rowkins and Muten asked questions and contributed to the debate of the report.

33.3 Resolved-

1) Cabinet agreed to the disposal of the assets identified at paragraphs 3.3- 3.20 of this report and the Part 2 report in the manner set out in the reports.

2) Cabinet delegated authority to the Director Property & Finance in consultation with the Cabinet Member for Finance and City Regeneration to approve terms and take any necessary steps to facilitate and complete the disposals of the properties identified and achieve best consideration.

3) Cabinet noted the work ongoing to ensure there is sufficient space available for creative and cultural industry in the city.

34 COVENANT ON PLOT 2 AND 3 IN WEST SALTDEAN

34.1 Cabinet considered a report concerning .

34.2 Councillors Rowkins, Robins and Sankey asked questions and contributed to the debate of the report.

34.3 Resolved-

1) Cabinet agreed not to seek to take over/acquire the Land for the purposes of public open space at this time.

2) Cabinet is asked to note the contents of Part 2 of this report.

35 ASSET STRATEGY (EXEMPT CATEGORY 3)

35.1 As per the Part One minutes.

36 COVENANT ON PLOT 2 AND 3 IN WEST SALTDEAN (EXEMPT CATEGORY 3)

36.1 As per the Part One minutes.

37 PART TWO PROCEEDINGS

37.1 **Resolved-** That Cabinet agreed that the confidential items listed on the agenda remain exempt from disclosure to the press and public.

The meeting concluded at 2.00pm

Signed Chair

Dated this day of

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Brighton & Hove City Council

Cabinet Agenda Item 46

Subject: **Raising Professional Standards in Housing**

Date of meeting: **17 September 2026**

Report of: **Cabinet Member for Housing**

Lead Officer: **Corporate Director Homes & Adult Social Care**

Contact Officer: **Laura Stanbridge**
Email: laura.stanbridge@brighton-hove.gov.uk

Ward(s) affected: All

Key Decision: Yes

Reason(s) Key: Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

1.1 This report seeks Cabinet approval of the new Housing Learning and Development Policy and Landlord Services Professional Standards. Together, these documents establish a clear framework for the competence, conduct and professional development of staff and contractors delivering landlord services on behalf of the Council. The Regulator of Social Housing's Consumer Standards Consumer Standards, introduced through powers under the Social Housing (Regulation) Act 2023 place a clear expectation on landlords to deliver safe, high-quality, and tenant-focused services. The Competence and Conduct Standard reinforces this by requiring housing professionals to demonstrate the skills, knowledge, experience, and behaviours necessary to meet these standards and achieve positive outcomes for residents

1.2 They have been developed in response to the requirements of the Social Housing (Regulation) Act, tenant feedback regarding service delivery, communication and professionalism, and the Council's commitment to becoming a Great Landlord.

1.3 The development of these policies reflect the Council Plan 2023-2027 outcome to deliver 'A responsive and learning council with well run services'

and the Housing Strategy 2024-2029 priority 5 ‘providing resident focused housing services’.

2. Recommendations

That Cabinet:

2.1 Approve the Housing Learning and Development Policy as set out at Appendix 1.

2.2 Approve the Landlord Services Professional Standards as set out at Appendix 2.

2.3 Notes that the documents will be reviewed periodically to ensure ongoing compliance with regulatory requirements and alignment with service priorities.

3. Context and background information

3.1 The Social Housing (Regulation) Act 2023 places a requirement on registered providers to ensure staff delivering housing services have the appropriate skills, knowledge, experience and behaviours, supported by a clear approach to learning and development. In response, Housing have developed a Housing Learning and Development Policy and Landlord Services Professional Standards to strengthen expectations around professional conduct, customer experience, competence and continuous improvement. The standards build on the Council’s existing Code of Conduct and Behaviour Framework by setting out specific expectations for staff and contractors delivering landlord services, ensuring professionalism, accountability and resident-focused service delivery remain at the heart of Landlord Services.

3.2 The development of these documents has been informed by evidence from housing complaints, resident feedback and engagement activity. Housing staff met directly with tenants to understand their experiences and expectations of landlord services, with particular focus on communication, behaviour and professionalism. This feedback informed the initial drafts, which were subsequently subject to consultation with tenants, staff and stakeholders to further refine the proposed standards and learning priorities. The final documents therefore reflect both regulatory requirements and the issues that matter most to residents, while providing a clear framework for supporting, developing and holding staff accountable to the standards expected by the Council.

3.3 Approval of these documents will provide a consistent and transparent approach for setting expectations about professional behaviour, customer service, learning and development, accountability and continuous

improvement across Housing services. The proposed framework will support compliance with regulatory requirements, strengthen assurance around workforce competence and conduct, and demonstrate the Council's commitment to improving resident experience and service outcomes through a culture of learning, professionalism and continuous improvement.

3.4 The Competence and Conduct Standard comes into force on 1 October 2026 and is designed to strengthen professionalism, accountability and tenant experience across the social housing sector. The standard requires registered providers to ensure that staff and contractors delivering housing services have the skills, knowledge, experience and behaviours needed to provide high-quality services, and that senior housing managers and executives hold, or are working towards, recognised housing qualifications. It also requires landlords to have a clear learning and development policy, a code of conduct for staff, robust arrangements for performance management, and meaningful opportunities for tenants to influence and scrutinise these arrangements. The standard reflects lessons learned from Grenfell and aims to ensure that residents are treated with respect, listened to, and receive safe, fair and accountable services from competent and professional housing staff

Existing Corporate Frameworks

3.5 As a local authority landlord, the council has a range of frameworks which support staff learning and conduct. The proposed Learning and Development Policy and Landlord Services Professional Standards have been designed to align with and build upon existing Council commitments and frameworks, including:

- Code of Conduct
- Behaviour Framework
- Customer Promise
- Learning Organisation Framework
- Anti-Racism Strategy
- Equality and Inclusion commitments
- Safeguarding responsibilities

3.6 The proposed documents incorporate these existing organisational principles into practical expectations relevant to Housing and Landlord Services, which have been shaped by residents.

Policy Development

3.7 The development of both the Learning and Development Policy and the Landlord Professional Standards was based on a series of in person

workshops with residents. The workshops were designed around the requirements of the Social Housing (Regulation) Act and adopted a collaborative, trauma-informed approach that encouraged participants to share their experiences and expectations in a safe and supportive environment. Tenants were provided with an overview of the new regulatory requirements before being invited to discuss what good landlord services look and feel like from a resident perspective. Through facilitated discussions, residents identified key themes including communication, respect, professionalism, accountability, listening and follow-through.

3.8 The key themes highlighted in the workshops with regards to professional standards were around improving our communication with tenants including keeping them informed; building relationships with tenants by positively demonstrating understanding and care and following up agreed actions promptly. Residents highlighted the importance of active listening, easy to understand communication and being treated with respect.

3.9 Other themes highlighted by residents in the workshops with regards to learning and development were to ensure staff had the correct qualifications and technical skills and knowledge to confidently and successfully carry out their roles. Residents highlighted the importance of providing staff with a range of opportunities for learning, particularly around understanding lived experience of residents, and considering how residents can contribute directly to staff learning.

3.10 Building on these themes, participants took part in co-production activities to help shape both the Professional Standards and the Learning and Development Policy. Residents explored the behaviours they would expect staff to demonstrate, identified areas where additional skills, knowledge or training could improve services, and highlighted priorities for workforce development. The outputs provided a valuable tenant-led evidence base that directly informed the development of the final policy and standards, ensuring resident expectations and experiences were embedded within the proposals.

3.11 Detailed analysis was undertaken of complaints made regarding staff conduct over a two year period and used this to build upon the feedback received at the in-person workshops. This analysis showed similar themes in customer experience, communication quality, professionalism, and inconsistent outcomes for residents. It highlighted the need for further training, improved oversight, more consistency, improvement contractor management and improving our internal communication. This analysis, together with the direct feedback from workshops was used to form the first drafts of the policies.

Consultation

3.12 The draft Learning and Development Policy and Landlord Professional Standards were put to public and staff consultation in June 2026 for four weeks.

3.13 The tenant consultation generated a significant level of engagement and provided valuable insight into residents' expectations of landlord services, staff conduct and professional development. While a number of respondents considered the proposed standards to be comprehensive, the majority used the opportunity to identify areas where service delivery could be strengthened. The strongest themes related to honest and transparent communication, responsive and accessible services, respectful treatment, accountability, better coordination between teams, and greater confidence that commitments made to residents would be followed through. Respondents also highlighted the importance of fairness, impartiality, effective record keeping, appropriate support for disabled and vulnerable residents, and clear standards for staff and contractors working in residents' homes. A consistent message throughout the responses was that policies should move beyond broad values and set out clear, observable behaviours and expectations that can be monitored and held accountable.

3.14 The staff consultation showed strong support for both the proposed Professional Standards and Learning and Development Policy, with respondents agreeing that the expectations reflected the professionalism, behaviours and values that should underpin housing services. Staff welcomed the focus on accountability, communication, safeguarding, equality and inclusion, and strongly supported a culture of learning, reflection and continuous improvement, including learning from complaints, tenant feedback and lived experience.

3.15 Alongside this support, staff highlighted the importance of ensuring the framework reflects the realities of housing work. Feedback emphasised that service delivery is influenced not only by individual behaviour but also by wider organisational factors such as workload pressures, staffing capacity, systems, processes and dependencies on other teams and agencies. Staff advocated for a supportive, learning-focused approach that promotes coaching, development and psychological safety, rather than an overly punitive response to concerns. Respondents also emphasised the need to more clearly align the framework with existing corporate commitments. Additionally, staff identified cross-team working, conflict management, safeguarding, mental health awareness, resilience and staff wellbeing as important priorities for future learning and development. Overall, the consultation provided strong endorsement of the proposed approach while helping to strengthen the framework by ensuring it reflects organisational

realities, promotes fairness and supports a culture of continuous improvement

Final Policy Content

3.16 The final Housing Learning and Development Policy has been significantly strengthened through the engagement and consultation process and now provides a more comprehensive and balanced framework for workforce development. In response to feedback, the policy has been expanded to place greater emphasis on communication skills, professional boundaries, de-escalation, mediation, coaching approaches, safeguarding, trauma-informed practice, equality, diversity and inclusion, and supporting residents with complex and diverse needs. The policy also now includes a stronger focus on staff wellbeing, psychological safety and reflective practice, recognising the challenging nature of housing work and the importance of supporting colleagues to learn, develop and perform effectively.

3.17 Feedback from both tenants and staff also influenced the inclusion of greater learning from complaints, service failures, tenant feedback and lived experience as formal drivers for learning and professional development. The policy places increased emphasis on cross-service working, understanding wider council services and partner agencies, and promoting a One Council approach to service delivery. Tenant involvement has been strengthened throughout the learning offer, with commitments to co-produced learning, community-based learning opportunities and direct engagement with residents as part of staff development.

3.18 The final policy also reflects feedback that learning and development should be viewed as a continuous improvement tool rather than solely a compliance requirement. Consequently, the policy aligns learning activity more closely with service improvement, skills audits, performance frameworks, regulatory requirements and organisational priorities. The resulting policy provides a broader, more resident-focused and learning-centred approach that supports workforce competence, professional growth and improved outcomes for tenants, while ensuring compliance with the Competence and Conduct Standard.

3.19 The final Landlord Services Professional Standards have been strengthened through consultation with tenants and staff and now provide a clearer framework for the behaviours expected of staff and contractors delivering landlord services. The standards place a strong emphasis on professionalism, respect, communication, accountability, accessibility and equality, while also aligning with existing corporate frameworks, including the Council's Code of Conduct, Behaviour Framework, Customer Promise, Anti-Racism Strategy and safeguarding principles. Feedback from tenants helped strengthen expectations around honesty, communication, reasonable

adjustments, follow-through on actions, accurate record keeping and joined-up working across services.

3.20 Staff feedback also influenced significant changes to the final document. The standards now place greater emphasis on learning, reflection and professional development, rather than a purely punitive approach, and explicitly recognise the complexity of housing work, the need for professional judgement and the influence of wider organisational factors on service delivery. Additional changes include the use of more positive, role-modelling language, stronger recognition of equality, diversity and inclusion, and clearer expectations relating to vulnerability, trauma-informed practice, managing conflict, collaborative working and leadership responsibility. The resulting standards provide a balanced framework that reflects both resident expectations and the realities of delivering housing services, while supporting continuous improvement and high-quality services.

Implementation and Monitoring

3.21 The Learning and Development policy will be implemented from 1 October 2026.

3.22 The Learning and Development Policy is clear that competence includes how staff treat tenants, and that the standards set out that unprofessional behaviour is addressed through management and HR processes. The new standards strengthen the expectation that the council can demonstrate this clearly in practice, showing not just that issues are dealt with, but how we learn from them and improve outcomes for residents.

3.23 The Housing's Learning and Development Forum will monitor the effectiveness implementing the policy and the impact for staff and tenants, and review periodic skills assessments of roles within landlord services.

3.24 There is a dedicated budget for learning and development of staff, as well as a bursary scheme for professional development, which we will utilise to support achieving the outcomes of the policy.

3.25 The policy and standards will be reviewed every 3 years or in the event of new legislation or significant change.

4. Analysis and consideration of alternative options

4.1 Landlords are required by the Social Housing Regulation Act to develop both policies in collaboration with tenants, and failure to deliver both the Learning and Development Policy and Professional Standards would amount to non-

compliance with this regulation. Therefore not delivering this work is not considered an alternative option.

5. Community engagement and consultation

5.1 We conducted a series of in person workshops with tenants to explore key themes around learning, development and staff behaviours, inviting open discussion and an opportunity to co-produce the policies. We then did a public consultation for 4 weeks on the platform Yourvoice, receiving 195 responses from tenants, and 30 from staff. We also received multiple responses directly from staff teams within the council.

5.2 We have consulted colleagues in Human Resources, Learning and Development and Trade Unions on the draft policies.

6. Financial implications

6.1 The current annual revenue budget for staff training across the HRA is £0.079m which will be utilised to support the policy, as well as making use of existing training materials and internal opportunities for shadowing and learning in the community.

Name of finance officer consulted: Michael Bentley Date consulted 27 July 2026

7. Legal implications

7.1 The regulator requires professional standards to be applied as set out in legislation and by guidance. Legal Services has reviewed the Learning and Development Policy and the Professional Standards for Landlord Services and does not consider that either document presents any legal issues. Whilst the Professional Standards set out the behaviours and expectations for staff within Landlord Services, they do not create a separate conduct framework. Any concerns or issues relating to employee conduct will continue to be managed through the Council's existing policies and procedures. Qualification and maintenance of qualification is an ongoing liability and needs to be routinely checked, to meet the standards.

Name of lawyer consulted: Simon Court Date consulted 14 August 2026

8. Equalities implications

8.1 The Learning and Development Policy and Landlord Services Professional Standards within the framework of the new Competence and Conduct Standard. This presents a significant opportunity to strengthen equality, diversity and inclusion across social housing by ensuring staff have the skills, knowledge and behaviours needed to deliver respectful, high quality

services to all tenants. The standard places greater emphasis on understanding and responding to the diverse needs of residents, tackling stigma and discrimination, improving engagement with underrepresented groups, and ensuring tenants have meaningful influence over service standards and organisational culture.

8.2 While new qualification requirements may present challenges for some employees, these can be mitigated through targeted support and development. Overall, the standard should help drive a more inclusive, tenant-focused culture that improves both workforce capability and outcomes for diverse communities

8.3 A staff Equalities Impact Assessment was completed when the policies were drafted.

9. Sustainability implications

9.1 There are no significant direct environmental sustainability implications arising from the adoption of the Housing Learning and Development Policy or the Landlord Services Professional Standards. The policies primarily relate to workforce development, professional conduct and service delivery.

9.2 Where possible, learning and development activity will continue to make use of existing digital learning platforms, virtual meetings and online resources, reducing the need for travel and supporting the council's wider objectives to minimise carbon emissions associated with business activity. The policies are therefore expected to have a neutral to modestly positive impact on environmental sustainability.

10. Health and wellbeing implications

10.1 The proposed Housing Learning and Development Policy and Landlord Services Professional Standards are expected to have positive health and wellbeing benefits for both residents and staff. For tenants, the policies promote respectful, professional and trauma-informed services, strengthen awareness of vulnerability and diverse needs, and support improved communication and resident experience.

10.2 For staff, the policies place greater emphasis on wellbeing, psychological safety, reflective practice and continuous professional development. They support a culture of learning, coaching and improvement, helping staff to manage the challenges of housing work while building confidence, resilience and professional competence. Overall, the policies are intended to contribute to positive wellbeing outcomes by fostering respectful relationships, supportive working practices and a culture of continuous improvement.

Other Implications

11. Procurement implications

11.1 The proposed policies have limited procurement implications. Implementation of the Learning and Development Policy may require the use of external training providers, accredited qualifications or specialist learning programmes, subject to available budgets and service requirements. In addition, the Professional Standards apply to contractors delivering landlord services on behalf of the council and may need to be reflected in relevant procurement, contract management and supplier arrangements.

12. Crime & disorder implications:

12.1 The proposed policies are expected to make a positive contribution to community safety by strengthening staff knowledge and professional practice in areas such as safeguarding, conflict management, vulnerability and partnership working. The policies support staff to identify risks, respond appropriately to anti-social behaviour and safeguarding concerns, and work effectively with relevant agencies to protect residents and communities

13. Conclusion

13.1 Cabinet is asked to approve the Housing Learning and Development Policy and Landlord Services Professional Standards to ensure the Council meets the requirements of the Social Housing (Regulation) Act and the Competence and Conduct Standard. These documents are important because they provide a clear and consistent framework for the skills, knowledge, behaviours and professional standards expected of staff and contractors delivering landlord services. Developed in collaboration with tenants and informed by feedback from tenants, complaints analysis and staff consultation, they will help strengthen professionalism, accountability and resident experience, while supporting the Council's ambition to be a Great Landlord and deliver high quality, resident focused housing services.

Supporting Documentation

Appendices

Appendix 1 Housing Learning and Development Policy

Appendix 2 Housing Professional Standards

Housing Learning and Development Policy

1. Purpose

The policy covers all staff involved in the delivery of landlord services. Brighton & Hove City Council is committed to ensuring that all Housing and landlord service staff are competent, confident and professional, and that tenants experience services which are respectful, informed and responsive.

This policy outlines how the Council supports colleagues to learn, develop and grow throughout their careers. Aligned to our Learning Organisation Framework, it promotes continuous professional development and provides opportunities for staff to build the knowledge, skills and behaviours needed to deliver excellent services, meet regulatory expectations on Competence and Conduct, and respond to the needs and feedback of tenants.

2. Regulatory Context

The Social Housing Regulation Act 2023 requires registered providers to have a written policy explaining how they:

- Support staff learning and development
- Ensure skills, knowledge, experience and behaviours are maintained
- Address poor performance and unprofessional conduct

3. Our commitment as an employer

Brighton & Hove City Council will:

- Provide structured, role appropriate learning opportunities
- Fund and support formal qualifications where required
- Enable learning through experience, reflection and engagement with tenants
- Co-produce learning and development involving tenants and residents wherever possible and appropriate
- Maintain clear expectations of professional behaviour, supported by training and management oversight
- Use tenant feedback, complaints and service failure as formal learning triggers

- Foster a culture where reflection, feedback and learning from mistakes are encouraged and supported.

4. Core Learning Provided by the Council

Brighton & Hove City Council will ensure access to learning covering:

- **Customer service and communication**, including core skills in effective communication, professional boundaries, de-escalation, and constructive approaches to challenging conversations, mediation and coaching.
- **Equality, diversity and inclusion**, including local demographics and protected characteristics
- **Trauma-informed practice**, including responding to vulnerability and diverse needs
- **Safeguarding,** and supporting tenants with complex needs
- **Technical housing knowledge** appropriate to role (repairs, ASB, allocations, compliance, etc.) including Awaabs Law
- **Relevant housing and public law**, appropriate to the role, increasing confidence and accuracy of advice
- **Council policy and procedure**, including escalation routes. **Understanding council services**, one council approach including improved understanding of partner agencies, mixed tenure issues, and delivery timelines
- **Learning from complaints, feedback, service failures and lived experience**, using reflection, review and continuous improvement to strengthen professional practice, improve tenant outcomes and prevent recurring issue
- **Staff psychological safety and wellbeing**, including reflective practice

5. Learning Opportunities and Methods

The Council provides learning through multiple routes, including:

- Managers should allow time where practicable to provide colleagues with reasonable opportunities to engage in learning and development activities that support their role, professional growth and service delivery
- Induction and mandatory refresher training
- Funded access to formal qualifications, accredited programmes and external training where possible

- Shadowing, mentoring and coaching opportunities across teams and services
- Peer learning, including case reviews, learning from complaints and feedback, and learning events
- Time spent with tenants, including tenant groups, community based learning, panels and co-produced training
- Learning delivered with residents, where appropriate

6. Qualifications and Professional Standards

Where required by regulation or role scope, the Council will support staff to:

- Hold or work towards approved housing or technical qualifications
- Develop professional capability at the appropriate level of responsibility
- Maintain continuous professional development
- Engage in external training where possible

7. Monitoring, Refresh and Assurance

The Council will ensure learning remains effective by:

- Monitoring training completion and competence through management oversight
- Refreshing learning in response to changing regulation, complaints and risk
- Using skills audits and performance frameworks to identify gaps
- Linking learning directly to service improvement plans

8. Professional Conduct and Accountability

Brighton & Hove City Council is clear that:

- Training supports professional behaviour
- Unprofessional or inappropriate behaviour will be addressed through management and HR processes
- Competence includes how staff treat tenants, not just what they know

9. Review and Continuous Improvement

This policy will be reviewed every 3 years with tenant and staff involvement, to ensure it continues to reflect:

- Regulatory requirements
- Tenant and staff expectations
- Service learning and organisational priorities

Housing Landlord Services Professional Standards

1. Purpose

These professional standards set out the standard of behaviour expected of all staff and contractors working within the landlord service on behalf of Brighton & Hove City Council. It builds on the Council's Code of Conduct for Employees, Behaviour Framework, Customer Promise, Anti-Racism Strategy and Safeguarding principles; adds practical expectations for housing services staff and relevant contractors.

All staff and contractors are expected to contribute to a culture of learning and improvement by acting on feedback, learning from mistakes, sharing knowledge, and continuously developing their skills and practice.

While these standards describe the behaviours expected of our staff, successful housing services depend on mutual respect and collaboration. We therefore strive for residents, staff, contractors and partners to work together in a positive, respectful and constructive manner in line with our Customer Promise

2. Scope

These standards apply to:

- All staff delivering a landlord service (permanent, temporary, agency)
- Contractors and partners delivering housing related services on the Council's behalf
- Anyone interacting with tenants in the delivery of housing management, repairs, asset management, ASB, engagement, compliance and related services

We expect all staff and contractors to strive to uphold these professional standards and will provide support, feedback, supervision and development opportunities to help them do so. Where concerns arise, these will normally be addressed through a supportive and reflective process that encourages learning, improvement and professional growth.

These standards will be applied in a way that promotes equality, diversity and inclusion, recognises individual circumstances and protected characteristics, and takes account of agreed workplace adjustments and support arrangements.

These standards recognise the complexity of housing work and the need for staff to exercise professional judgement and make fair, proportionate and lawful decisions.

Where standards are not being met consistently, or where concerns are serious in nature, appropriate action will be taken in line with the Council's existing policies and procedures, including formal HR or contractual processes where necessary.

3. Our Standards of Behaviour in Housing Services

3.1 Respect, Dignity and Professionalism

Housing staff will:

- Be polite, calm, kind and respectful in all interactions
- Listen without interrupting and give their full attention
- Communicate concerns in a professional, respectful and objective manner, ensuring observations and decisions are based on evidence and professional judgement and recognise individual circumstances
- Use correct names and pronouns, and respect identity and preferences
- Not use behaviour that is intimidating, aggressive or otherwise undermines the safety, dignity or wellbeing of others

3.2 Communication and Customer Experience

Housing staff will:

- Communicate clearly, using plain language
- Be accurate and factual, communicating with honesty
- Avoid jargon and explain processes, decisions and limits openly. Manage expectations early and realistically
- Make reasonable efforts to respond within published service standards and keep tenants informed where delays occur
- Where there are delays, take reasonable steps to keep tenants informed of reasons and next steps where practical, giving approximate timescales where exact dates are not possible
- Attempt to use tenants' stated communication preferences first time where possible
- Ensure written communication is professional and easy to understand
- Consider and provide communication in accessible formats and through methods that meet residents' needs.

3.3 Vulnerability and Equality

Housing staff will:

- Take a trauma informed approach, considering lived experience where possible

- Demonstrate professionalism and respect, avoiding assumptions and recognising the diverse experiences, backgrounds and circumstances of tenants.
- Listen to and acknowledge tenants' experiences, perspectives and concerns with respect and professionalism. Make and record reasonable adjustments in line with our Vulnerability and Reasonable Adjustments Policy

3.4 Accuracy, Accountability and Follow Through

Housing staff will:

- Take reasonable and proactive steps to progress agreed actions, monitor outstanding issues, and keep tenants informed throughout.
- Make accurate, factual and respectful case records
- Check previous case notes where possible to understand the tenant history and circumstances
- Take ownership and escalate appropriately when issues cannot be resolved
- Not close jobs or cases without proper completion or explanation where appropriate

3.5 Privacy, Consent and Boundaries

Housing staff must:

- Seek consent before entering homes or sharing information, except where lawful or policy requirements allow otherwise
- Show identification and explain the purpose of the visit clearly
- Follow protocols for access, data protection and confidentiality
- Communicate via agreed representatives (e.g. carers, PAs) when required

3.6 Conduct in Tenants' Homes

When attending tenants homes or estates, staff and contractors will:

- Be respectful of the fact that this is someone's home
- Be considerate of tenants preferences and requests where reasonable, safe and practical
- Be tidy, clean and leave properties safe and secure
- Not smoke, swear, make inappropriate remarks or gestures
- Treat tenants and their homes with respect, raising concerns about tenancy, safety or property matters sensitively, professionally and without making assumptions

3.7 Managing Conflict and Complex Situations

Housing staff will:

- Approach situations calmly and objectively
- Listen to all parties and explain processes clearly
- Avoid punitive approaches where possible, ensuring action taken is reasonable and proportionate in accordance with Housing policy and procedures
- Be confident, consistent and fair in decision making, explaining outcomes clearly

3.8 Acting as One Council

Housing staff will:

- Work collaboratively across teams and services
- Make all reasonable attempts to give consistent information and avoid contradictory messages
- Take responsibility for coordinating responses where practical, minimising the need for tenants to make repeated contact with multiple council teams

3.9 Leadership and Management Responsibilities

Housing Managers and supervisors will:

- Model the behaviours set out in these standards
- Support staff with training, reflection and supervision, using our Learning Organisation Framework
- Address allegations of poor conduct promptly and consistently within existing policy
- Use complaints, feedback and incidents as learning opportunities
- Ensure contractors meet the same behavioural standards

3.10 Speaking Up and Accountability

Housing Staff will:

- Challenge inappropriate behaviour safely and appropriately, in alignment with our Anti-Racist Strategy, Safeguarding Protocols and our Customer Promise
- Raise concerns through management, Human Resources or whistleblowing routes
- Participate openly in learning and improvement

3.11 Conduct in Public Spaces and When Representing the Council

Housing staff and contractors will:

- Drive safely, responsibly and in accordance with traffic laws when operating council or work-related vehicles
- Park considerately, avoiding obstruction, nuisance or unsafe positioning on estates, public roads or near homes wherever possible
- Recognise that when driving council vehicles they are visible representatives of the service at all times

HousingStaff in uniform or otherwise identifiable as council representatives will:

- Act respectfully and professionally on estates and in public spaces
- Avoid behaviour that could cause concern, distress or reputational damage
- Be mindful that their conduct reflects on the wider Council.

Brighton & Hove City Council

Cabinet

Agenda Item 47

Subject: **Housing in Brighton and Hove Annual Report**

Date of meeting: **Thursday, 17 September 2026**

Report of: **Cabinet Member for Housing**

Lead Officer: **Corporate Director for Homes & Adult Social Care**

Contact Officer: **Harry Williams, Martin Reid**

Email: harry.williams@brighton-hove.gov.uk
Email: martin.reid@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key: All Wards

For general release

1. Purpose of the report and policy context

1.1 This report presents the Housing in Brighton & Hove Annual Report 2025/26 and seeks Cabinet approval for publication. The annual report brings together, in one document, information about landlord performance, resident experience, complaints, service improvements, safety and compliance, investment, housing supply and value for money.

1.2 For the first time, the annual report incorporates the Tenant Satisfaction Measures alongside wider service and complaint information. This gives tenants and leaseholders a clearer, joined-up view of performance and supports the Council Plan outcomes of a fair and inclusive city, homes for everyone, and a responsive council with well-run services.

2. Recommendations

2.1 Cabinet notes the performance, resident experience and service delivery information set out in the Housing in Brighton & Hove Annual Report 2025/26 at Appendix 1 and the BHCC Self-Assessment against Housing Ombudsman's Complaint Handling Code at Appendix 2.

2.2 Cabinet approves publication and distribution of the Housing in Brighton & Hove Annual Report 2025/26 to tenants and leaseholders, subject to any final factual, presentational and accessibility amendments

2.3 Cabinet delegates to the Corporate Director for Homes & Adult Social Care in consultation with the Cabinet Member for Housing decisions related to factual, presentational and accessibility amendments

3. Context and background information

3.1 The council is landlord to 12,251 homes. This report summarises housing service performance during 2025/26 and sets out priorities for 2026/27.

3.2 For the first time, the report brings together Tenant Satisfaction Measures (TSM), service performance, complaints, investment, housing supply, resident support and value-for-money information into a single, accessible document.

3.3 Each year the Council is required by the Housing Ombudsman to complete a self-assessment against the Ombudsman's Complaint Handling Code. This is to ensure our complaints service meets the required standards.

3.4 The assessment is reviewed by Cabinet, as the council's governing body, and the Member Responsible for Complaints reports on our compliance, learning and improvement actions. This helps ensure transparency, accountability and continual improvement in how we handle complaints.

3.5 The report supports transparency, helping residents understand how services are performing, where improvements have been made and where further work is needed.

3.6 A representative sample of 1,050 tenants took part in the 2025/26 TSM survey.

3.7 TSM results show continued improvement across most service areas. Overall tenant satisfaction increased from 67% to 71%, with significant improvements in satisfaction with repairs, home safety and the council's ability to listen and respond to tenant views. Building safety compliance also improved substantially.

3.8 Complaint and anti-social behaviour (ASB) reports increased during the year. Whilst satisfaction with complaints handling and ASB services remains an area for improvement, overall performance trends are positive.

3.9 Priorities for 2026/27 include providing safe, well-maintained homes, strengthening tenant influence and scrutiny, improving complaints handling and ASB services; and enhancing communication and the overall resident experience.

3.10 A planned programme of stock condition surveys will provide better information about council homes, enabling targeted investment and stronger asset management.

4. Analysis and consideration of alternative options

4.1 The alternative is to publish separate reports, covering performance, TSMs

and complaints. This is not recommended because it would make information harder for residents to find and understand, duplicate content and reduce the opportunity to present a coherent account of performance, learning and improvement.

5. Community engagement and consultation

5.1 This Housing in Brighton and Hove Annual report has been developed in line with the council's Community Engagement Framework and draws on a range of resident insight gathered throughout the year. This includes the independent TSM survey, complaints and compliments, Councillor and MP enquiries, service feedback, scrutiny through resident governance structures, tenant and leaseholder meetings, and engagement activities undertaken by housing services.

5.2 During 2025/26, residents helped shape service improvement priorities through participation in complaints learning workshops, consultation exercises and regular engagement forums. Co-produced workshops involving tenants, leaseholders and staff explored themes emerging from complaints and feedback, particularly in relation to repairs, complaint handling, health and safety, customer service and communication. Feedback gathered through these activities has directly influenced the content of this report, including the areas highlighted as priorities for improvement and the actions the council is taking in response.

5.3 The report also reflects what residents have told us through the TSM survey about service strengths and areas that matter most to them. Alongside performance information, the report sets out how resident feedback has been used to improve services and informs our future priorities.

5.4 The Housing in Brighton and Hove Annual Report will be distributed to tenants and leaseholders through Homing In and published online in September 2026. Accessible formats will be made available on request.

6. Financial implications

6.1 There are no new financial commitments arising directly from approval of this report, which is for noting and publication only. Any costs associated with producing, publishing and distributing the Housing in Brighton & Hove annual report will be met from existing Housing Revenue Account budgets. The HRA is a ring-fenced landlord account and any future financial implications linked to service improvements, regulatory requirements, repairs, building safety, stock condition, new supply or resident engagement will be considered through the council’s normal budget setting, Targeted Budget Management and HRA business planning processes.

Name of finance officer consulted: Ferrise Hall Date consulted (13/08/26):

7. Legal implications

7.1 The annual report supports compliance with the council's obligations as a Registered Provider under the Social Housing (Regulation) Act 2023, including requirements relating to transparency, accountability, publication of Tenant Satisfaction Measures (TSMs), and effective tenant scrutiny of landlord performance. It also supports compliance with the Housing Ombudsman's statutory Complaint Handling Code by demonstrating complaint handling performance, learning from complaints, and resulting service improvements.

Name of lawyer consulted: Simon Court Date consulted (13/08/26):

8. Risk implications

8.1 Not publishing a clear annual account would reduce transparency and make it harder for residents to scrutinise landlord performance. Publishing a combined report provides a stronger evidence base for accountability and service improvement.

9. Equalities implications

9.1 The report is intended for all tenants and leaseholders, including residents who may face barriers to accessing information or services. Plain English, accessible digital publication and alternative formats will support wider access. The report also describes work on vulnerability, reasonable adjustments, adaptations, safeguarding and support for residents with additional needs.

10. Health and Wellbeing Implications:

10.1 Safe, secure and well-maintained homes are important determinants of physical and mental health. The report covers building safety, damp and mould, adaptations, Seniors Housing, safeguarding, tenancy sustainment and anti-social behaviour. Transparent reporting and improvement priorities support earlier intervention and better outcomes for residents.

11. Crime & disorder implications:

11.1 The report includes performance and improvement activity relating to anti-social behaviour, hate incidents, tenancy breaches and neighbourhood safety. The ASB Improvement Plan is intended to strengthen victim support, case management, partnership working and communication with residents

12. Conclusion

12.1 The Housing in Brighton & Hove Annual Report 2025/26 provides residents and Cabinet with a clear, joined-up account of landlord performance, resident experience, complaints, investment and priorities for improvement. Approval will support transparent publication in September 2026 and strengthen residents' ability to understand and scrutinise housing services.

Supporting Documentation

1. Appendices

1. Housing in Brighton and Hove Annual Report
2. BHCC Self-Assessment 2025-26

Council homes in Brighton & Hove

Annual report for council tenants and leaseholders 2025 to 2026

This report is about housing services between April 2025 and March 2026 and plans for this year 2026/27.

DRAFT

Welcome to the housing annual report for 2025/26

Our housing

As of 31 March 2026, we had 12,251 council homes made up of:

- **7,146** flats
- **595** studio flats
- **4,079** houses
- **250** bungalows
- **181** maisonettes

Tenant Satisfaction Measures – what you told us about how we're doing

Brighton & Hove City Council is committed to becoming a great landlord and making your homes safe, and the estates good places to live. As part of this, social housing landlords are required by the Regulator of Social Housing to collect and report information each year about how well they are performing – known as 'Tenant Satisfaction Measures' (TSMs).

A representative sample of 1,050 tenants were invited to take part in the survey by completing a telephone interview. The results help us understand what we're doing well and where we need to improve, so we can focus on the things that matter most to our residents.

Overall satisfaction – 71%

This measures the proportion of tenants satisfied with the overall landlord service provided by Brighton & Hove City Council. This is the overall indicator and reflects tenants' combined experience of repairs, safety, communication and neighbourhood management.

The proportion of respondents who report that they are satisfied with the service provided by their landlord increased from 67% to 71% (+4 percentage points), meaning a higher proportion of tenants said they were satisfied with the service they receive.

Our TSMs show encouraging improvements in how residents feel about our engagement and communication, and we are using these encouraging signs to be motivated to do more.

62.7% of respondents said they were satisfied that we listen to their views and act upon them, up from **52.6% in 2024/25**. This improvement suggests that our increased focus on resident engagement is having a positive impact.

71.7% of respondents said they were satisfied that we keep them informed about things that matter to them, up from **67.3% in 2024/25**. Clear and timely communication is important in building trust, and we are pleased to see this measure continue to improve.

DRAFT

76.8% of respondents said they were satisfied that they are treated fairly and with respect, compared to **76.2% in 2024/25**. While the increase is small, it remains one of our strongest results and reflects our commitment to delivering services with professionalism and respect.

Building safety

Satisfaction that the home is safe – 74%

This measures whether tenants feel their home is safe to live in. As a tenant perception measure, this may reflect views on building safety compliance and other safety-related work, including dealing with hazards through repairs, as well as wider perceptions of safety such as building security.

The proportion of respondents who report that they are satisfied that we provide a home that is safe increased from 69.3% to 74% (+4.7 percentage points). This improvement is encouraging but we recognise that 1 in 4 tenants were not satisfied, so by doing a stock condition survey of all our homes and identifying the work that needs to be done, this percentage will increase.

Fire safety checks (TSM)

This measures the proportion of fire risk assessments carried out in the buildings that need them. This indicator covers communal safety checks in the buildings.

This has increased from 77.8% (5,503 of 7,070) to 99.6% (7,164 of 7,192) (+21.8 percentage points), meaning a much higher proportion of homes were covered by the required fire risk assessments.

As a result of completing fire risk assessments at our high rise and seniors housing blocks in 25/26, we identified 992 new high, medium and low risk actions. Over the same time, we completed 5,543 fire safety actions, which includes actions identified in previous years.

We're also working to make sure all council homes have working smoke detection, with 97.7% of homes completed as of March 2026.

Key safety areas

We completed 4,141 domestic electrical safety tests in 25/26. More than 96% of homes are now in line with our recently introduced 5-year testing cycle - 12,360 of 12,750 homes (including 499 Seaside Homes properties).

We have also been carrying out essential upgrades to ageing electrical infrastructure at blocks of flats in the city. Our work so far has included rising and lateral mains alongside UK Power Network, evacuation and refuge systems, and communal emergency lighting.

This work will ensure the power supply remains safe and reliable.

The proportion of homes which required legionella risk assessments (water safety) have been carried out increased from 64.0% (8,112 of 12,680) to 96.6% (12,317 of 12,750) (+32.6 percentage points).

Gas safety checks have been carried out in 99.96% of the homes which require them (11,785 of 11,790), a slight decrease on 99.98% of homes last year (11,771 of 11,773).

Another key focus has also been building safety in our 8 large panel system buildings, with discussions with residents continuing on the future options for those buildings.

The proportion of homes for which all required asbestos surveys and any follow-up inspections have been carried out stood at 99.6% (6,675 of 6,702), unchanged from 99.6% (6,725 of 6,753) previously, meaning performance remained high.

The proportion of homes which required communal passenger lift safety inspections to be carried out decreased from 100.0% (3,076 of 3,076) in 24/25 to 98.9% (3,124 of 3,157) in 25/26.

Homes not meeting the Decent Homes Standard – 2.4% (TSM)

The Decent Homes Standard is the national standard for assessing whether social homes are in a reasonable condition. We assess this using information about hazards, disrepair and modern facilities such as kitchens and bathrooms. The government is currently reforming the national standard and further guidance is expected.

The proportion of homes that do not meet the Decent Homes Standard increased from 2.0% (251 of 12,680) to 2.4% (306 of 12,750) (+0.4 percentage points).

Repairs and maintenance

Satisfaction with repairs – 77.3% (TSM)

This indicator measures satisfaction with our overall repairs service among tenants who said they had a repair in the last 12 months. It reflects the tenant experience of repairs, including quality, customer service and the overall service received.

The Repairs Helpdesk answered a total **59,738** calls during 2025/26 and raised **59,513** responsive repairs.

The proportion of respondents who have told us they are satisfied with our overall repairs service over the last 12 months increased from 68.0% to 77.3% (+9.3 percentage points).

Satisfaction with time taken to complete most recent repair 71% (TSM)

The proportion of respondents who told us they were satisfied with the time taken to complete their most recent repair form when they reported it increased from 63.3% to 71.0% (+7.7 percentage points).

Satisfaction that the home is well maintained 71.1% (TSM)

The proportion of respondents who told us they are satisfied that we provide a well-maintained home increased from 65.2% to 71.1% (+5.9 percentage points). This reflects how you feel we maintain your homes, including things like the condition of facilities like kitchens and bathrooms, windows and doors, heating, and the general state of repair.

Repairs completed within target timescale (TSM)

This measures the proportion of repairs completed within the landlord's target timescales, split between emergency and non-emergency repairs.

Our standard target timescales are 24 hours for emergency responsive repairs and 28 days for non-emergency responsive repairs.

Following the introduction of Awaab's Law, relevant emergency damp, mould and hazard repairs are included in the emergency measure, while other damp and condensation jobs with longer target timescales are included in the non-emergency measure.

- The proportion of non-emergency responsive repairs completed within our target timescale increased from 47.2% (13,509 of 28,620) to 56.6% (18,368 of 32,450) (+9.4 percentage points).
- The proportion of emergency responsive repairs completed within our target timescale decreased from 97.5% (12,836 of 13,169) to 96.8% (12,804 of 13,234) (–0.7 percentage points).

Repairs backlog

We have continued to prioritise reducing the repairs backlog while responding to significant increased demands for our services. Working with our contractors, we completed 45,684 repairs 2025/26 (13,234 emergency and 32,450 non-emergency), compared with 41,789 in 2024/25 (13,169 emergency and 28,620 non-emergency).

Damp, mould and condensation

Following the introduction of Awaab's Law in October 2025, we introduced a dedicated team to deal with all repairs involving damp and mould, with a set process for investigating and resolving issues within prescribed timescales. From October 2025 to March 2026, the service received 1748 reports of a repair due to damp and mould, and we carried out 1420 surveys.

Sustainability and energy efficiency

Over the past year, we've installed solar panels in over 400 more council homes, which we estimate could help reduce energy bills by a total of £100,000 across the homes every year. The 3-year programme, due to be completed this summer, will have installed solar panels on approximately 1,000 homes.

We've also been successful in a bid for £826,522 of grant funding from the government's Warm Homes Social Housing Fund, which will part-fund the work on improving the Energy Performance Rating Certificate in 100 homes over the next 3 years. We've completed the first 16 homes with improvements including insulation, ventilation and solar panels.

At Walter May House, we've installed air source heat pumps and solar panels to reduce carbon emissions and provide reliable heating and hot water for 32 flats.

These energy efficiency projects help cut costs, lower emissions, and make the city's homes more sustainable.

Full Fibre

Work has continued this year on installing Full Fibre Optic Broadband for residents in all blocks of flats we started working with BT Openreach, City Fibre and Virgin Media to. This offers a more reliable, faster, offers 8K streaming, uses 70% less energy and provides capacity for the future. This is part of a national upgrade across the United Kingdom, and will eventually replace the existing broadband copper wire network.

Each company offers its' own packages, which provides greater choice to our residents in terms of price and available services.

Schools and apprenticeships

Our apprenticeship programme continues to grow. We have also strengthened our engagement with schools and training providers by visiting secondary schools in the city to promote jobs in construction, emphasising this career choice for underrepresented groups, including women.

This will help us develop our future skilled workforce and we will continue to offer training opportunities and employment to our residents.

Ensuring our housing meets the changing needs of a diverse population

Moving home

We let 444 homes, including 65 new homes and 379 previously occupied homes, 140 fewer than last year's total. As of 31 March 2026, 139 of our homes were empty, up slightly from 131 at the same point last year.

The average time to re-let an empty home was 80 days over the year, including the time needed to carry out major repair work. This is down from an average re-let time of 85 days in the previous year.

We completed work to bring a total of 429 empty council homes and 332 temporary accommodation homes back into use.

Adaptations

We completed 349 minor adaptations and 252 major adaptations to council homes, ensuring these properties support residents to live their lives as independently as possible.

Seniors Housing

Senior Housing has delivered strong performance in 2025/26, with high levels of resident support, engagement and satisfaction.

The service carried out over 4,000 wellbeing checks each week and maintained regular contact with around 250 residents weekly, alongside making 608 referrals to partner services to help residents live independently and raising appropriate safeguarding concerns.

Most residents (93%) received an annual review, supporting personalised oversight of needs, while 696 residents attended scheme meetings, demonstrating good engagement.

Resident satisfaction is high at 80%, with strengths in communal area management and improved complaints handling. This reflects a service that is consistently supporting residents to live safely and independently, with strong engagement and positive outcomes despite increasing demand and complexity

Increasing the number of council homes

Increasing the supply of affordable housing remains a key priority for the council and, during 2025/26, we delivered **136** new council homes.

Our New Homes for Neighbourhoods programme is building much-needed new council homes for rent, with projects underway to deliver more than 400 new homes across a number of sites in the city – including work starting on an exciting development of 222 homes and a community hub in Moulsecoomb.

Our Homes for Brighton & Hove partnership with Hyde has also started work on 183 council-owned affordable rented homes at Sackville Trading Estate.

Through our Home Purchase Policy, we bought a total of **118** former council homes back to let to people in housing need in 2025/26. This was alongside converting a former office into 11 new homes for temporary accommodation at Palace Place, purchasing a small block of 6 homes at the former St Aubyn's School site in Rottingdean and building a new house in on a former garden site in Hangleton.

Our landlord services

Complaints

This year, we received 1,012 stage 1 complaints, which equates to 79.4 complaints per 1,000 homes and 195 stage 2 complaints, 15.3 complaints per 1,000 homes. Of the stage 1 complaints received, 77.2% were responded to within the timescales set out in the Housing Ombudsman's Complaint Handling Code. For stage 2 complaints, 81.5% were responded to within the required timescales.

We recognise that responding to complaints promptly is important, and while the majority of complaints were handled within the required timescales, we know there is still work to do to improve our performance.

Our Tenant Satisfaction Measure on complaints handling also showed that 28.3% of tenants who responded were satisfied with our approach to handling complaints. While an improvement from 26.2% in 24/25, it highlights that we need to continue improving the way we communicate with residents, learn from complaints and provide a better customer experience.

These figures form part of our annual Tenant Satisfaction Measures (TSMs). We provide more detailed information on complaints, complaint themes, learning outcomes, and the improvements we are making later in this report.

Housing Customer Services

Our Housing Customer Service Team answered 19,856 calls and replied to 27,695 emails. The team also managed 890 gas access cases to help make sure all our homes remain compliant on gas safety, and 284 requests from tenants wanting to improve their homes.

Income collection

Our rent collection rate is **92.49%**

As of 31 March 2026, there was **£5.7 million** unpaid rent – **8%** of the total rent due.

During the year, **351** referrals were made to Money Advice Plus, helping tenants access quality debt advice and maximise their income. **Financial outcomes totalled £1.2 million.** The Housing Income Management Team supported tenants to access **£47,172** in Discretionary Housing Payments.

We've also worked with the Money Adviser Network to improve access to specialist advice for tenants experiencing financial difficulty, helping them to access instant debt advice.

With more than **1,171** tenants migrating over to Universal Credit this year, we've set up a process to support residents with the rent element of their claim, with an emphasis on early contact and support.

Estates Service

The Estates Service team clean **808** blocks weekly and 77 properties monthly, covering a variety of housing types. In 25/26, we achieved a **94%** cleanliness rate across all properties under our care.

The team completed **5,417 jobs** during 2025/26, delivering a wide range of practical estate and property management services that help keep homes and neighbourhoods safe, secure and well-maintained. This work included lock changes, key cutting, 'handy person' tasks, installation of grab rails and other minor adaptations, security and safety improvements, property inspections and minor repairs.

In addition, the team dealt with **2,818 cases of fly-tipping** and supported residents through **4,264 assisted waste collections**, helping to maintain clean, safe and accessible communities

They also completed **1,436** tasks to remove items from communal areas, ensuring compliance with fire safety regulations. To improve fire safety, a team has been set up to make more frequent visits and keep communal areas hazard-free.

Satisfaction with neighbourhood contribution (TSM)

This measures whether tenants feel that the council as a landlord contributes positively to the neighbourhood. While this is focussed on our role as a landlord, resident views may also be

shaped by their wider experience of the local area and other services that affect how the neighbourhood feels.

The proportion of respondents who report that they are satisfied that their landlord makes a positive contribution to their neighbourhood increased from 58.5% to 63.9% (+5.4 percentage points).

Your community, your neighbourhood

Our Tenancy Sustainment Team supports tenants at risk of losing their homes with benefit claims, safeguarding, home improvements, and moves to more suitable accommodation. The team also supported **83** residents with hoarding issues.

Our Tenancy Team opened **1,987** new cases in the year. The team issued **30** Community Protection Warnings, **7** Community Protection Notices, and obtained **3** 'Closure Orders' to provide long-term relief for neighbours.

They handled **476** cases of tenancy breaches, including:

- untidy gardens - **125**
- interior property conditions - **139**
- leaseholder breach – **17**

The team also investigated **13** fraud cases involving tenants and leaseholders, which led to 8 homes being reallocated to households that needed, and were entitled, to this accommodation.

ASB Tenant Satisfaction Measures

During 2025 / 2026, 920 anti-social behaviour (ASB) cases were opened, including 30 cases involving hate incidents. This equates to 72.2 ASB cases and 2.4 hate-related ASB cases per 1,000 homes. Tenant satisfaction with the landlord's approach to handling anti-social behaviour was 55.3%, representing a marginal decrease of 0.5 percentage points compared with the 2024/25 result of 55.8%.

Responding to and learning from complaints and feedback

We received **1,012** Stage 1 complaints relating to housing landlord services, compared to a total of **838** in 2024/25.

Types of complaints received

- Repair/maintenance/improvement of property condition – 599 (578 in 2024/25)
- Anti-social behaviour complaints – 34 (17 in 2024/25)
- Staff conduct – 88 (70 in 2024/25)
- Failure to take action – 29 (19 in 2024/25)
- Estate management services – 41 (31 in 2024/25)
- Unhappy with service delivery – 99 (49 in 2024/25)
- Re-housing – 9 (8 in 2024/25)
- Disagree with policy / procedure – 18 (15 in 2024/25)
- Delay in providing outcome – 37 (13 in 2024/25)
- Other tenancy matters – 58 (38 in 2024/25)

How we handled your complaints

We investigated all complaints to see where we need to take action to improve our services.

- **46**% were upheld (35% in 2024/25)
- **7**% were partially upheld (14% in 2024/25)

- **47**% were not upheld (51% in 2024/25)
- **195** complaints were not resolved at Stage 1 and escalated to Stage 2 (131 in 2024/25)

Stage 1 – **77%** responded within 10 working days (73% in 2024/25)
Stage 2 – **82%** responded within 20 working days (57% in 2024/25)

There are some types of complaints that we can't accept. This year we have refused to accept complaints for the following reasons:

- Where the same matter had already been considered at all stages of the internal complaint procedure, where the issue was not part of an ongoing situation, no new matters were raised and where no new evidence was provided which may have affected the previous outcome.
- Where the outcome sought by the customer was solely compensation for damages, whether personal injury or unquantifiable financial loss, and no additional matters were raised.
- Where a more appropriate route of appeal or challenge was available (Data Protection or information governance issue, leaseholder service charge dispute, complaint solely about the conduct of elected members, matters which can only be decided by a court such as whether discrimination has occurred) and where no additional matters were raised.
- Where customers wished to complain that senior members of staff had not replied personally to their emails, despite the customer requests having been considered and responded to through the relevant process (such as a complaint, a Subject Access Request or a service request).

Service improvements from complaints

Using the insights from complaints and other feedback, we've introduced several key service improvements over the last year, including:

- Customer Care training is being rolled out and embedded across Repairs & Maintenance. This will bring more consistent communication, stronger ownership of cases, and improved customer experience for residents.
- Cross-tenure working on anti-social behaviour and noise related reports is being strengthened, resulting in a more joined-up, clearer service experience.
- Residents are being consulted on the draft Vulnerability and Reasonable Adjustments Policy. This will promote more inclusive, tailored support that reflects residents' needs.
- Internal team communication has been improved, resulting in less repetition and a simpler, quicker experience for residents.
- A proactive approach to identifying issues and offering compensation is in place, bringing faster, fairer resolutions without residents needing to complain.
- Developed clearer information on planned and major work.
- Invited residents who have raised concerns about staff conduct to workshops on shaping our new staff guidance.
- Contacting customers with repairs which have been outstanding for some time, starting with the oldest cases, resulting in reduced waiting times and improved reassurance.

We're committed to continue improvements based on your feedback to increase efficiency, transparency and the proactive community support we provide.

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Performance data published by the Housing Ombudsman (published October 2025, covering 2024/25 financial year)

Where tenants or leaseholders are dissatisfied with the outcome of the council's internal complaint processes, they can escalate their complaint to the Housing Ombudsman.

The Housing Ombudsman can consider matters where the local authority is the landlord or freeholder, all other types of complaint (including those relating to homelessness or emergency accommodation) can be escalated to the Local Government & Social Care Ombudsman.

The information provided helps us to benchmark our performance against landlords of a similar size and type.

The Housing Ombudsman Service now produces a comparator figure known as the National Maladministration Rate for Landlords of a Similar Size and Type. The analysis for Brighton & Hove City Council's performance for 2024/25 is below.

In 2024/25 the Housing Ombudsman investigated 18 cases relating to Brighton & Hove City Council's landlord services.

Brighton & Hove City Council's overall maladministration rate was 84%, compared to a national average of 80% for landlords of a similar size and type. This represents a slight increase from 83% in 2023/24 and indicates that while performance remains broadly comparable with similar landlords, there is still significant work required to reduce the number of upheld findings and improve outcomes for residents. The ombudsman's findings have informed a range of service improvements, particularly in complaint handling, property condition and repairs services

Outcome category 2024/25	National (local authorities)	National (landlords with +10,000 units)	Brighton & Hove City Council
Severe maladministration This is the most serious failing.	6%	5%	3%
Maladministration This is when there was a failure which has adversely affected the resident.	45%	41%	33%
Service failure When there was a minor failing, but action is still needed to put things right.	22%	22%	46%
Mediation Where the resident and landlord agree to enter into mediation and, with the ombudsman's intervention, reached an agreed outcome.	1%	2%	0%
Redress This finding is made when there is evidence of maladministration but the landlord has identified and acknowledged this prior to the ombudsman's formal investigation and has, on its own initiative, taken steps and/or made an offer of compensation that puts things right.	7%	12%	5%
No maladministration We find no maladministration where the landlord	11%	13%	10%

Outcome category 2024/25	National (local authorities)	National (landlords with +10,000 units)	Brighton & Hove City Council
acted in accordance with its obligations and policies or procedures. Minor failings may have been found but these caused no detriment to the resident.			
Outside jurisdiction The complaint will not or cannot be considered by the ombudsman.	7%	6%	3%
Withdrawn The resident withdrew their complaint, and the ombudsman was satisfied as to the circumstances.	0%	0%	0%

Compliance with the Housing Ombudsman complaint handling code

There have been some occasions this year where we have unfortunately not been able to meet compliance with the Housing Ombudsman's complaint handling code**:**

These results relate to cases during 2025/26:

- Maladministration in the landlord's complaints handling.
- Maladministration in the landlord's handling of the resident's reports of sub-standard repairs, reports of a leak from the property above and maladministration in the associated complaint handling.
- Maladministration in the landlord's handling of the resident's kitchen leak, associated repairs and in the landlord's handling of the resident's complaint.
- Severe maladministration in the landlord's handling of the resident's reports of ASB, maladministration in the landlord's handling of the resident's concerns about the allocation of the neighbouring property and maladministration in the landlord's complaint handling.
- Maladministration in the landlord's response to the resident's concerns about ASB and service failure in the landlord's response to the resident's concerns about staff conduct.
- Service failure in the landlord's administration of the resident's service charge account and service failure in the landlord's handling of the associated complaints.
- Service failure in the landlord's complaint handling.
- Service failure in the landlord's response to the resident's reports of ASB and service failure in the landlord's complaints handling.
- Service failure by the landlord in respect of its handling of communal flooring replacement at the property and service failure in the landlord's complaints handling.

We apologise on every occasion we've got things wrong and review each case to identify where we need to improve.

Residents dissatisfied with the outcome of stage 2 complaints can escalate the matter to the Housing Ombudsman.

The Housing Ombudsman offers an advice, mediation, and complaint resolution service.

Visit www.housing-ombudsman.org.uk/residents/guide-to-landlord-performance-reports, email info@housing-ombudsman.org.uk or call 0300 1113000.

For information on our complaints process and our self-assessment against the Housing Ombudsman's Complaints Code to see how we comply, visit www.brighton-hove.gov.uk/HOCCSA

Brighton & Hove City Council's complaints policy and procedure is available at www.brighton-hove.gov.uk/complaints.

Value for money

Where every £1 of our income came from

- Rent: **87p**
- Service charges: **10p**
- Car parks and garages: **1p**
- Grants and other income: **1p**
- Commercial rent: **1p**

How every £1 was spent

- Running Housing services: **20p**
- Repairs and improvement: **67p**
- Repaying loans and interest: **13p**

Total income: £81.400m
Expenditure: £81.778m
The difference in expenditure of £0.378m million has been taken from general reserves in the Housing Revenue Account to fund the investment in your homes.

Funding for new homes: £48.6m

- **£26.8m** from borrowing
- **£9.4m** from capital receipts
- **£8.7m** from grants
- **£3.7m** from reserves

The Housing Revenue Account (HRA) is a ring-fenced account for the income and spending related to council housing. The account ensures tenants' rent is used to maintain, improve, and manage their homes and housing services.

The HRA faces financial challenges. The risks include, but are not limited to, increasing demands associated with health and safety compliance, disrepair claims and rent arrears. These risks are being monitored and managed through our HRA business planning.

The council will continue to review expenditure, identify efficiencies and prioritise resources to support financial sustainability and manage emerging pressures. We are keen that tenants are involved in this planning and hold quarterly meetings to give you the opportunity to share your ideas and opinions about the focus of investment.

Looking ahead

Over the coming year, we will continue our work to become a great landlord for all our tenants and leaseholders. This means focusing on our learning and improvement journey, building a clear understanding of what is working well and where we need to do better, and using that to drive meaningful and lasting change.

We will continue to prioritise the safety and condition of our homes. This includes enhancing our stock condition survey programme so that we have a better, more complete understanding of our homes and can plan investment and improvements more effectively.

We are carrying out stock condition surveys in all our properties over the next 2 years, so please do ensure you respond to the letter or text to make an appointment.

These surveys will provide a stronger evidence base for future investment decisions, enabling a more targeted approach to asset management and investment planning. This will help ensure that investment is directed to areas of greatest need, support the long-term sustainability of the housing stock and, where possible, reduce pressures on revenue budgets, including responsive repairs.

We are also making sure that tenant voices are at the heart of everything we do. We are strengthening how we capture and use tenant insight so that residents' experiences shape how services are designed and delivered. We will also review and improve how we engage with you, including how we support you to engage with us, scrutinise our performance and influence decisions about your homes and services. This will be done by working with you to revise our Tenant Engagement Strategy.

We will place particular focus on improving our complaints handling to make sure concerns are responded to consistently, openly and in a way that leads to clear service improvements. We are also prioritising improvements in how we manage anti-social behaviour, with the aim of providing a more effective, joined-up response that improves the experience for residents.

We are prioritising improvements to our anti-social behaviour service, including stronger support for victims, more consistent case management, improved partnership working and better communication with residents. Through our ASB Improvement Plan, we aim to deliver a more effective, responsive and resident-focused service that helps resolve issues more quickly and supports safer communities.

We will hold our first repairs scrutiny panel and have recruited interested tenants to be part of this group. The panel will look at how our repairs service is working and help us identify where we can improve.

In early 2027 we will start moving over to a new Housing Register and Allocations software system, improving the resident experience for those looking to move homes.

Through these priorities, we aim to deliver a more consistent, transparent and responsive service, while continuing to improve outcomes for you and the homes you live in.

Thank you for your continued support.

If you have any comments on this annual report or there's anything you'd like to see in future editions, we welcome your feedback. Please contact us at:

housing.performance@brighton-hove.gov.uk

X.com/bhhousing

facebook.com/BHHousing

Or you can write to us at: Housing Performance, Housing Centre, Unit 1 Fairway Trading Estate, Eastergate Road, Brighton, BN2 4QL.

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Housing Ombudsman Complaint Handling Code: Self-assessment (Brighton & Hove City Council) - May 2026

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes or No	Evidence, commentary or explanation
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	Yes	Brighton & Hove City Council complaints procedure has been updated to use this wording and it is included in our staff complaint handling training
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be	Yes	Section amended based on Housing Ombudsman Compliance feedback. Complaints policy wording now includes offering customers the opportunity to make a complaint and handling representative complaints in line with policy.

	handled in line with the landlord's complaints policy.		
1.4	Landlords must recognise the difference between a service request and a complaint.	Yes	Policy and staff training includes the distinction between a service request and a complaint.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request.	Yes	Section amended based on Housing Ombudsman Compliance feedback.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint.	Yes	Residents completing surveys are signposted to complaints process.

Section 2: Exclusions and Acceptance of Complaints

Code provision	Code requirement	Comply: Yes or No	Evidence, commentary or explanation	Additional commentary
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits.	Yes	This is set out in the Brighton & Hove City Council complaint procedure, Appendix B.	
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: the issue giving rise to the	Yes	Exclusions include A matter which has not affected the original complainant personally (this does not apply to someone representing a complainant) or caused them an injustice.	

	complaint occurred over twelve months ago. legal proceedings have started. matters that have previously been considered under the complaints policy.		
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Section amended based on Housing Ombudsman Compliance feedback Policy wording amended to clarify that 'Complaints should be made within 12 months of the customer becoming aware of the issue, unless there is good reason for them not to have done so, which will be considered on a case-by-case basis.'
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter	Yes	This is included in Brighton & Hove City Council complaints procedure All complaints are carefully considered and will only be

	is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.		rejected if they fall under any of the categories at app B of the council's complaints procedure or if they are more than 12 months old.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	All complaints will be considered on a case-by-case basis. Instructions to provide full reasons for rejected complaints and signposting to the Ombudsman are included in the Brighton & Hove City Council complaints procedure.

Section 3: Accessibility and awareness

Code provision	Code requirement	Comply: Yes or No	Evidence, commentary or explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	How to make a complaint. Complaints can be made over the phone, by email, by online form, by post, via a third party or face to face to any member of landlord staff visiting their home or area.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	This is included in staff complaint handling training and in the Customer Experience Induction Briefing which all new starters to the council are encouraged to attend.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint	Yes	Brighton & Hove City Council performance management framework does not target volumes of complaint or upheld rates (unlike for example, response times

	volumes are potentially a sign that residents are unable to complain.		which are targeted), in order not to inadvertently create avoidance of accepting complaints. Volumes are monitored however as they can be indicative of emerging issues.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	The council's full complaints procedure is published on our website with brief, simplified descriptions of how we operate our corporate and statutory complaints procedures. How to make a complaint
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Brighton & Hove City Council Corporate Complaints Policy and Procedure. This is set out in the complaint procedure.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or	Yes	Brighton & Hove City Council Corporate Complaints Policy and Procedure. This is set out in the complaint procedure.

	accompanied at any meeting with the landlord.		
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	This is included in complaint correspondence at the appropriate points. We also publish this information in Homing In newsletter – sent electronically or hard copy to each tenant and leaseholder every quarter. Exploring other options such as inclusion in rent statements/gas safety check letters.

Section 4: Complaint handling staff

Code provision	Code requirement	Comply: Yes or No	Evidence, commentary or explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Brighton & Hove City Council Corporate Complaints Policy and Procedure. The Customer Feedback team. The complaints procedure has been updated to include that officers within the Customer Feedback Team fulfil the role of "complaints officer".
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	This is covered in training. Additionally, complaints are of a high priority for the administration and leadership team of the council. We would not usually experience any barriers to resolving complaints.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint	Yes	Dedicated complaint resource is set aside in the highest complaint volume areas. Complaints are a very high priority for the administration and leadership

handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively.

team of the council and are discussed at quarterly performance sessions. In house training is provided and it is run quarterly available for all council staff who respond to complaints. The Customer Feedback team also offer tailored training to teams with high volumes of complaints

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes or No	Evidence, commentary or explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Brighton & Hove City Council Corporate Complaints Policy and Procedure. Brighton & Hove City Council complaint policy covers all complaints.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra-named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Section amended based on Housing Ombudsman Compliance feedback. Policy wording clarifies no additional stage between service request and formal complaint and includes detailed wording on early and local resolution.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Brighton & Hove City Council Corporate Complaints Policy and Procedure. Regular high volume contractors handle Stage 1 complaints, then escalation to Stage 2 as standard, with no additional stages.
5.4	Where a landlord's complaint response is handled by a third	Yes	Regular high volume contractors handle Stage 1

	party, it must form part of the two stage complaints process. Residents must not be expected to go through two complaints processes.		complaints, then escalation to Stage 2 as standard, so there are no additional stages.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaint handling clause is included in relevant contracts and regular contractors attend complaint handling training.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking.	Yes	Brighton & Hove City Council Corporate Complaints Policy and Procedure. Section amended based on Housing Ombudsman Compliance feedback and supported by template letters and training.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are and are not responsible for.	Yes	Brighton & Hove City Council Corporate Complaints Policy and Procedure. Section amended based on Housing Ombudsman Compliance feedback and supported by templates and training.
5.8	At each stage of the complaints process, complaint handlers must deal with complaints on their	Yes	Brighton & Hove City Council inhouse complaint handling training and Ombudsman best practice guidance.

	merits, act independently, and consider all relevant evidence carefully.		
5.9	Where a response will fall outside timescales, landlords must agree suitable intervals with residents for updates.	Yes	Policy wording includes requirement to contact customer, explain delay and agree update intervals at both Stage 1 and Stage 2.
5.10	Landlords must make reasonable adjustments for residents and keep records of adjustments and disabilities disclosed.	Yes	This is in line with the council's equalities policy and working practices across departments.
5.11	Landlords must not refuse to escalate a complaint unless there are valid reasons.	Yes	Complaint policy Appendix B sets out valid reasons and applies equally at Stage 2.
5.12	A full record must be kept of the complaint and outcomes at each stage.	Yes	Captured in the complaint case management database.
5.13	Landlords must ensure complaints can be remedied at any stage.	Yes	Included in staff training and guidance on identifying appropriate remedies.
5.14	Landlords must have policies for managing unacceptable behaviour.	Yes	Managing unreasonable customer behaviour policy referenced in complaints procedure.

5.15	Any restrictions must be proportionate and comply with Equality Act 2010.	Yes	Managing unreasonable customer behaviour policy and complaints procedure guidance.

Section 6: Complaints stages

Stage 1

Code provision	Code requirement	Comply: Yes or No	Evidence, commentary or explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	This is included in Brighton & Hove City Council complaints handling training.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within 5 working days of the complaint being received.	Yes	This is set out in the Brighton & Hove City Council Corporate Complaints Policy and Procedure. This is included in complaints handling training.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working	Yes	This is set out in the Brighton & Hove City Council

	days of the complaint being acknowledged.		Corporate Complaints Policy and Procedure and training.
6.4	Landlords must decide whether an extension to this timescale is needed when considering complexity and inform the resident. Extensions must be no more than 10 working days without good reason.	Yes	Brighton & Hove City Council Corporate Complaints Policy and Procedure has been updated to reflect this.
6.5	When informing a resident about an extension, they must be provided with Ombudsman contact details.	Yes	Included in complaints handling training.
6.6	A complaint response must be provided when the answer is known, not when outstanding actions are completed.	Yes	Policy updated based on Housing Ombudsman Compliance feedback including delay wording and timeframes.
6.7	Landlords must address all points raised and provide clear reasons referencing policy, law and good practice.	Yes	Included in complaints handling training.
6.8	Additional complaints raised must be incorporated if related, or logged separately if not.	Yes	Policy amended with detailed wording under section 7 and Appendix B updates.

6.9	Landlords must confirm key details in writing at stage 1 completion including decision, reasons, remedy and escalation.	Yes	Templates, internal guidance and training updated to reflect requirements.

Stage 2

Code provision	Code requirement	Comply: Yes or No	Evidence, commentary or explanation
6.10	If not resolved at stage 1, complaint must progress to stage 2 which is final response.	Yes	Set out in complaint procedure and training.
6.11	Stage 2 requests must be acknowledged and logged within 5 working days.	Yes	Set out in complaint procedure and training.
6.12	Residents must not be required to explain reasons for stage 2 request.	Yes	Set out in complaint procedure and training.
6.13	Stage 2 must be handled by a different person than stage 1.	Yes	Handled by independent Customer Feedback Managers.
6.14	Final response must be issued within 20 working days.	Yes	Policy updated and reflected in procedure and training.

6.15	Any extension must not exceed 20 days without good reason.	Yes	Policy wording updated accordingly.
6.16	Residents must be given Ombudsman contact details when extensions applied.	Yes	Policy wording updated and included in procedure and training.
6.17	Response must be provided when answer known.	Yes	Policy updated to reflect monitoring and updates requirement.
6.18	All points must be addressed with reference to policy and law.	Yes	Complaint handling training covers this.
6.19	Stage 2 completion must confirm decision, remedy, actions and Ombudsman escalation.	Yes	Set out in complaint procedure and training.
6.20	Stage 2 is final response and must involve relevant staff.	Yes	Customer Feedback Managers coordinate with services to ensure accuracy and agreement.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes or No	Commentary or explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include apologising; acknowledging where things have gone wrong; providing an explanation; taking action if there has been delay; reconsidering a decision; amending a record; providing a financial remedy; changing policies.	Yes	Putting things right – guidance on remedying faults in service delivery and complaint handling. Included in staff training and guidance for identifying appropriate remedies.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Putting things right – guidance on remedying faults in service delivery and complaint handling. Included in guidance on remedies.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy	Yes	Any actions or service improvements identified through the complaint process are logged and reported up through departmental management

	proposed must be followed through to completion.		teams for monitoring to conclusion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Our remedy guidance has been created based on the guidance from both the Housing Ombudsman Service and the Local Government and Social Care Ombudsman.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary or explanation
8.1	Landlords must produce an annual complaints performance and service improvement report including self-assessment, analysis of performance, refusals, Ombudsman findings, improvements, and relevant reports.	Yes	Annual complaints and service improvement report for the Housing Management service. The published report meets these criteria.
8.2	The report must be reported to the governing body and published with their response.	Yes	Annual complaints and service improvement report for the Housing Management service. The published report meets these criteria.
8.3	Landlords must carry out a self-assessment following significant restructure or procedural change.	Yes	We will do this as the need arises.
8.4	Landlords may be asked to update the self-assessment following an Ombudsman investigation.	Yes	We will do this as requested.
8.5	If unable to comply due to exceptional circumstances,	Yes	We commit to doing this if an incident arises.

landlords must inform Ombudsman and residents and provide a compliance timescale.

Section 9: Scrutiny and oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes or No	Evidence, commentary, explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Brighton & Hove City Council Corporate Complaints Policy and Procedure. This is set out in section 4 of the policy and is included in complaint handling training.
9.2	A positive complaint handling culture is integral to effectiveness. Landlords must use complaints as intelligence to identify issues and introduce positive changes.	Yes	Reporting on trends and issues is provided regularly to senior managers in services to support introduction of positive changes to service delivery.
9.3	Accountability and transparency are integral. Landlords must report back on learning and improvements to stakeholders.	Yes	Reporting on actions, learnings and service improvements are provided back to services on a quarterly basis and included in quarterly briefings to members.
9.4	Landlords must appoint a suitably senior lead person accountable for complaint	Yes	Head of Tenancy Services performs this role and is also the SRO for the complaint handling review project.

	handling and identifying trends and risks.		
9.5	A member of the governing body must be appointed as the Member Responsible for Complaints (MRC).	Yes	Yes, the Cabinet member for Housing.
9.6	The MRC must ensure the governing body receives regular information and has access to staff and insight.	Yes	MRC receives quarterly briefings and has full access to suitable staff to provide further information.
9.7	As a minimum the MRC and governing body must receive updates on complaint volumes, trends, Ombudsman outcomes, and annual reports.	Yes	MRC receives quarterly briefings including these matters and Corporate Director is copied to Ombudsman decisions.
9.8	Landlords must have a standard objective for complaint handling that emphasises collaboration, collective responsibility, and professional standards.	Yes	This is embedded in staff objectives, training and organisational values relating to complaint handling. This is contained within the complaint handling training and reiterated at all forums where complaints are discussed, including at senior decision-making level. A project is underway to

review complaint handling processes to further improve these aspects of complaint handling.

Brighton & Hove City Council

Cabinet

Agenda Item 48

Subject: **Improving Outcomes in Adult Social Care**

Date of meeting: **Thursday, 17 September 2026**

Report of: **Cabinet Member for Communities, Equalities, Public Health & Adult Social Care**

Lead Officer: **Corporate Director for Homes & Adult Social Care**

Contact Officer: **Steve Hook, Edward Yeo**

Email: **Steve.Hook@Brighton-hove.gov.uk**
Edd.yeo@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key: Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

1.1 Following February 2026 Cabinet Paper on Adult Social Care Improvement Plan, this report will update on progress on agreed actions highlighting improved outcomes for residents requiring care and support. The Improvement Plan is designed to fulfil statutory obligations arising from regulatory judgement and to set targets for additional areas of improvement.

1.2 The Care Quality Commission (CQC) is responsible for independently assessing how local authorities discharge their adult social care duties under Part 1 of the Care Act 2014. Introduced through the Health and Care Act 2022, the assurance framework provides national oversight of council performance in areas such as assessing needs, supporting people, safeguarding, leadership and governance. CQC assessments are no longer viewed as one-off inspections; instead, they form part of a continuous assurance model based on self-assessment, regular engagement, evidence reviews, case tracking and, most importantly, the experiences of people who draw on care and support and their carers. The aim is to provide assurance that local authorities are meeting their statutory responsibilities, driving improvement and delivering high-quality, person-centred services.

1.3 For Brighton & Hove, CQC regulation is closely aligned with the Council Plan priorities, particularly creating a fair and inclusive city, a healthy city that helps people to thrive, and a responsive and learning council with well-

run services. The CQC framework tests whether residents receive timely, equitable and effective support, whether services help people live independently and safely, and whether the council demonstrates strong leadership, governance and continuous improvement. Improvements arising from CQC assurance therefore contribute directly to reducing inequalities, improving health and wellbeing outcomes, strengthening resident experience, and ensuring the council learns from feedback and evidence to deliver sustainable, responsive services for local people.

1.4 This report will also explain the next phase of Care Quality Commission Inspection Framework and the requirements for Brighton & Hove City Council.

2. Recommendations

2.1 Cabinet notes the progress of Adult Social Care Improvement Plan as part of bi-annual update

2.2 Cabinet notes the next stage of Care Quality Commission (CQC) Inspection Framework including anticipated expectations for Brighton & Hove

3. Context and background information

3.1 Care Quality Commission (CQC) Inspection Framework – as reported in February Cabinet Paper

3.1.1. A new regulatory framework for Local Authorities with responsibilities for Adult Social Care was announced in 2022, the first pilot inspections were completed by early 2024. Brighton & Hove City Council was notified of the Inspection Process starting in November 2024, with an onsite inspection completed in April 2025.

3.1.2. The Regulatory Framework measures how well Local Authorities deliver their responsibilities under Part 1 of the Care Act 2014.

3.1.3. A report has been completed by CQC and has given the overall rating for Brighton & Hove City Council as ‘Requires Improvement’, with a score breakdown below;

Quality Statement	**Score**
Score Assessing Needs	1
Supporting people to live healthier lives	2
Equity in experience and outcomes	2
Care provision, integration and continuity	2
Partnerships and communities	2
Safe pathways, systems and transitions	2
Safeguarding	2
Governance, management and sustainability	2
Learning, improvement and innovation	2

Score 1 – shows significant shortfalls (inadequate), Score 2 shows some shortfalls (Requires Improvement), Score 3 shows a good standard (good). Score 4 shows an exceptional standard (outstanding).

3.2 **Section 50 notice** – **as reported in February Cabinet Paper**

The CQC issued Brighton & Hove a section 50 notice for a score of 1 in Assessing Needs, which means that they gave formal notice of the judgement to the Secretary of State for Health & Social Care. As a result of this the Council worked closely with Local Government Association to complete a response plan, which was shared with Department for Health & Social Care (DHSC).

The Section 50 notice highlighted 2 main areas of concern1. Waiting times for assessment including waiting well procedures and 2. Completion of annual reviews. The Adult Social Care Improvement Plan addresses these areas of concern.

The score of 1 against assessing needs which resulted in the Section 50 notice also impacted on the outcome scores for several of the other Quality Statements. Most notably these were Equity in Experience and Outcomes, Care Provision, Integration and Continuity, Safe Pathways, Systems and Transitions. These ratings remained at 2 – requires improvement - due to the wider impact of how our assessing needs score effects user experience and the monitoring of services we provide.

Since the CQC Inspection on-site visit there has been improvement in the key areas, specifically Annual Reviews and Wait times in teams explained further below.

Since the submission of the improvement plan to DHSC, we have been working closely with a Department of Health & Social Care Advisor, who has been attending regular meetings both as 1-1's with key members of staff and the monthly Improvement Board meetings. The Improvement Board is the key operational group delivering on identified workstreams, chaired by Director of Adult Social Services (DASS) and attended by senior managers in Adult Social Care.

The DHSC advisor has recognised the progress made against key actions, and we are anticipating the Section 50 notice being removed in Autumn 2026.

3.3 **Brighton & Hove City Council's Learning Organisation Framework**

3.3.1 The Adult Social Care Improvement Plan was developed by being:

- **…connected** – Adult Social Care are working closely with support from external stakeholders (e.g. Department for Health & Social Care, Local Government Association, Benchmark authorities) and internal stakeholders with experience of regulation (Children's Social Care and

Housing). This ensures that we identify best practice examples and can build from shared experiences.

- **…confident** – the areas for development identified during the inspection, reflected the areas identified in the self ssessment – Wait times, Annual Reviews, out of area placements, Use of residential care. We know that improvement in those areas will lead to improved outcomes for residents and results in future regulation.
- **…innovative and creative** – Adult Social Care has identified opportunities to introduce new ways of working and new technology to support delivery of key actions. E.g. use of digital tools to support case work and speed up processes around reviews and contact whilst individuals wait for a service.
- **…diverse and inclusive** – Adult Social Care has a diverse workforce that reflects the diversity of Brighton & Hove. The diversity of our workforce is monitored as part of a national programme and have an established infrastructure to ensure we continue to hear from ethnically diverse groups in the city.
- **…healthy and psychologically safe** – The council recognises that our staff played an important part in the CQC Inspection and will continue to monitor responses by Adult Social Care staff in Staff Surveys and engagement opportunities.

3.3.2 **Areas of Improvement**

As a result of the Requires Improvement judgement, Brighton & Hove is working closely with Local Government Association (LGA) to support the improved outcomes. The support offered by LGA is offered to all Local Authorities who received Requires Improvement or Inadequate rating. Copied below are the key areas of improvement that were submitted for the Stage 3 (6 months after release of CQC report) return completed in June 2026

3.3.3 **Progress so far**

We have made significant progress in our Residential Admissions reporting. Following clarification from DHSC, we have brought ourselves in line with national benchmarking and separated s117 service users from our reporting. This has meant a significant improvement explained below

- Move from 15th in peer group to 3rd in peer group for Residential & Nursing Placement for 18–64-year-olds
- Move from 14th in peer group to 7th in peer group for Residential & Nursing Placement for 65+

3.3.4 We are also anticipating further improvement in benchmarking when client-level data is fully implemented.

3.3.5 Prioritised Actions and Updates

Prioritised actions	**Update**
Expanded Reablement	Having appointed a Senior Programme Manager for Reablement, we have reviewed case files to

Offer	help support the case for an expanded Reablement offer. As part of the review, we have evidenced the opportunity for an expanded reablement programme and remodelling of existing services. The business case has identified a pilot phase, which we anticipate launching in July 2026.
Reduced number of placements in Residential & Nursing Homes	As described above we have made significant improvement in our benchmarking performance following clarification on data returns by DHSC. Having established a task & finish group we have now returned this to business-as-usual approach, channelling the work into our existing meetings with other Council departments including Housing colleagues.
Reduced Wait Times for Assessment	As described above we are working closely with Care and Health Improvement Adviser to source external support to review our pathways and embed a culture of proportionality. We have introduced new tools in proportionate reviews, which have now launched and are being monitored within teams.
Waiting Safely Framework	Waiting Safely Framework has successfully launched and is well understood by operational teams. As part of the framework, we have included approaches to contact, which will be monitored by our performance team. The categorisation of cases will support improvement in data quality identifying anomalies at team level and further improve confidence in our reporting
Increased Annual Reviews	We have achieved the target of 45% of annual reviews completed on time in 2025/26 and have a further target to improve to 55% for 26/27. We have allocated targets to teams, which can now be monitored on a regular basis. This will spread the targets throughout the year and give each team a focus on regular reviews.

3.4 **Future CQC Approach**

Care Quality Commission has recently briefed Local Authorities on the next phase of Inspection Framework. Regulation was reintroduced for Local Authorities in 2024, with previous Inspections delivered in 2010/11, the first phase was an opportunity for 'baselining' to understand the performance of Local Authorities and how that compared nationally. The next phase of the Inspection Framework is to move to a regular pattern and a 'business-as-usual' approach. This means that:

- Quality Statements will be the same – How Local Authorities work with people, Providing Support, Ensuring Safety within the System and Leadership
- Stronger focus on unpaid carers experience and improved co-production processes
- The end-to-end process will be shortened, lasting 19 weeks from the point of notification to the publication of the report.
- Communication approach will change, with more regular meetings and longer time on site (5 days)
- Rating characteristics have been introduced to provide clarity on how the overall judgement was reached and areas for improvement

3.5 **Next Steps**

3.5.1 Self-Assessment

To prepare for the new Inspection Framework, explained further below, Adult Social Care teams will start a series of workshops to help develop an updated Self-Assessment. The Self-Assessment will be in keeping with new guidance published by CQC and will incorporate learning from the previous years' experience. When complete the Self-Assessment will be shared with Lead Member for Adult Social Care for oversight.

3.5.2 Proportionality & Pathways Workshops

We are currently working closely with Local Government Association, who are supporting all Local Authorities with a Requires Improvement judgement. The LGA will support Brighton & Hove Council in delivering workshops to review all of our assessment pathways and help embed a culture of proportionality. The LGA support with our management of waiting lists.

4. Analysis and consideration of alternative options

4.1 CQC Inspection has highlighted areas of improvement for Adult Social Care in Brighton & Hove that match our self-assessment completed at the start of the Inspection Framework. In identifying and addressing those areas there has been improvement in key metrics explained in this report. If performance had continued on a similar trend (e.g. low performance on annual reviews, under-utilised re-ablement and high residential admissions) there would have been a deterioration in resident outcomes and compliance with statutory duties. The next phase of Inspection Framework will support our

continuous improvement journey, engaging with staff and ensuring better outcomes for residents with adult social care needs.

5. Community engagement and consultation

5.1 Brighton & Hove City Council has engaged closely with internal & external stakeholders since the introduction of the CQC Inspection Framework. The regular communication will continue and includes:

- Email communication for regular updates, before the Inspection timetable has been announced, during the Inspection and post Inspection result
- Attendance at Partnership Boards such as the Learning Disability Partnership Boards to engage with our communities
- Ongoing work with local Voluntary, Commnity and Social Enterprise Sector organisations such as Bridging Change to ensure we are reaching our BRM Communities and serve their needs appropriately, particularly in respect of initial contact with Adult Social Care and Safeguarding.
- Workshops delivered by Brighton & Hove and supported by LGA
- All staff briefings chaired by Director of Adult Social Services (DASS) explaining our current performance, the Inspection process and how staff will be involved.
- Other communication – video's, briefing notes and team meetings
- Regular attendance and participation at regional groups to maximise learning opportunities.

6. Financial implications

6.1 There are no direct financial implications as a result of this report. However, The Adult Social Care Improvement Plan informs budget management and development and informs a single Adult Social Care Transformation Plan that is part of the delivery of the council's Medium-Term Financial Strategy. This plan both meets the requirements for service improvements such as in relation to reviews performance and for 2026/27 this has resulted in service investments of £1.122m leading to improvements and identified savings of £10.092m which is monitored and reported monthly. Savings achieved through increased reviews performance currently stand at £1.5m as at TBM04, a significant achievement.

Name of Finance Officer consulted: Brian Smith Date Consulted: 02/09/2026

7. Legal implications

7.1 The Health and Social Care Act 2022 and associated regulations provide CQC with statutory powers to independently assess how well Local Authorities deliver their responsibilities under Part 1 of the Care Act 2014. Where one or more of the quality statements is given a score of 1 by CQC, pursuant to Section 50 of the Health and Social Care Act 2008 (as amended), CQC must inform the Secretary of State for Health and Social Care.

Name of lawyer consulted: Sandra O'Brien Date consulted 16/06/26

8. Risk implications

8.1 We recognise that the level of staffing resources allocated to assessment services, and the current financial challenge of the council represents a significant risk in terms of improving the responsiveness and quality of assessment and meeting the new requirements of CQC regulation.

This is particularly in relation to reducing wait times for assessment and increasing reviewing performance. It is essential that the need for quality improvement and achieving financial stability in Adult Social Care are risks that require an integrated single plan for delivery around managing demand and improving service performance. This level of service transformation is not possible without a level of up-front investment to assist in delivering the changes needed.

8.2 Risk Mitigation

Therefore, an investment fund of just over £1m has been agreed to 31 March 2027 to support the development of Adult Social Care Services to deliver on a single Demand Management Transformation Plan and Service Improvement Plan as follows:

- £332K – Social Work Professional Development and Leadership
- £684K – Set–up a Dedicated Review Team and increased Brokerage Support for more targeted placements
- £81K – Developing a Reablement offer via an experienced Programme Manager
- £25K for consultancy on a Telecare review
- **Total: £1.122M**

The Dedicated Review Team and enhanced Brokerage resource have been Operational from January this year, as has the Reablement Programme Manager. We have seen the benefits of this investment already during this year as evidenced by our improved reviews performance and reduced waiting times for assessment. We are confident that these additional resources will help drive forward our Transformation Programme successfully over the coming year and will be reviewed in the light of the continuing demand for improvements and savings over the course of future regulatory requirements and the Medium-Term Financial Plan up to March 2030.

9. Equalities implications

9.1 The implementation of the Adult Social Care Improvement Plan has several key equality implications given the CQC findings and Council's Statutory

Duties under Care Act and Public Sector Equality Duty. The Improvement Plan will positively impact groups with protected characteristics, ensuring that they have equity in access, assessment and when in receipt of services. By addressing key improvement areas in wait times, reablement and residential admissions outcomes will improve for those individuals and their families.

10. Health and Wellbeing Implications:

10.1 In delivering Adult Social Care Improvement Plan, Brighton & Hove City Council will improve Health & Wellbeing outcomes for its residents. As evidenced in the paper above the council has identified key improvement areas using evidence including benchmarking with other local authorities. The improvements identified will be tracked and monitored through existing governance processes.

11. Conclusion

11.1 The Adult Social Care Improvement Plan provides a clear framework for responding to the CQC judgement and strengthening outcomes for residents who draw on care and support. Progress has already been made in key areas, including annual reviews, waiting safely arrangements, reablement planning and improved use of performance data. Continued delivery of the plan, alongside the Demand Management Transformation Plan, with an updated self-assessment and preparation for the next phase of CQC assessment, will support the Council to evidence sustained improvement, meet its statutory duties, and maintain a clear focus on safe, timely and person-centred support for residents and unpaid carers.

Brighton & Hove City Council

Cabinet Agenda Item 49

Subject: **Day Options for Adults with Learning Disabilities**

Date of meeting: **Thursday, 17 September 2026**

Report of: **Cabinet Member for Communities, Equalities, Public Health and Adult Social Care**

Contact Officer: **Steve Hook, Director Adult Social Care**
Email: Steve.Hook@brighton-hove.gov.uk

Ward(s) affected: **All**

Key Decision: Yes

Reason(s) Key: Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000 and is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

1.1 At the Full Budget Council meeting held on 26th February, the Council made a preliminary decision in relation to its budget proposals. Part of this indicative resourcing decision included a proposal to close the Wellington House Day Options Service for Adults with Learning Disabilities and Autism, with day support to be re-provided through external commissioned provision. A relevant extract of the Full Council report can be found at: (Appendix 1)

1.2 This budget proposal was developed as part of the Council's budget-setting process and is intended to contribute towards achieving the required financial savings to achieve a balanced budget whilst the council continues to meet its statutory duties and the assessed needs of service users. No decision could be made on the proposal until a full consultation was undertaken with those potentially affected.

1.3 A consultation ran between 14th April and 7th July 2026, and the outcome of the consultation is set out in this report.

2. Recommendations

2.1 That Cabinet approves the closure of Wellington House Day Centre following a carefully managed transition of all current service users to

access alternative day provision in the external provider market to ensure that all Wellington House service users receive equivalent day support and care which meets their assessed needs.

2.2 That Cabinet delegates authority to the Corporate Director of Homes and Adult Social Care, in consultation with the Cabinet Member for Communities, Equalities, Public Health and Adult Social Care, to take all necessary actions to give effect to the above recommendation.

3. Context and background information

3.1 Wellington House is a day centre for adults with learning disabilities in the Elm Grove area of Brighton & Hove and is open Monday to Friday, it is closed weekends and is open 51 weeks of the year. It provides day services for Adults with Learning Disabilities and Autism. Currently 21 adults with learning disabilities receive support from this service across the week. 8 of the attendees have complex behavioural support needs. Some individuals within this group are autistic and have additional needs, including communication difficulties, sensory processing differences, mental health needs, epilepsy, and sight loss. They require a high level of support. Other attendees have Moderate level support needs. The service was not designed to support individuals with complex health and mobility needs in addition to the needs of the current cohort.

3.2 4 Individuals also use Wellington house as a drop in option with their support staff on some days of the week.

3.3 Staff are trained in positive behavioural support and receive training in autism awareness and using appropriate communication and support strategies. The service has an Autism accreditation 2020 from the National Autistic Society based upon the support approach and environment.

3.4 In 2019, after the Council's decision to create a whole life pathway by integrating the Children Disabilities team with the Adult Community Learning disability team, the building was divided into two parts to accommodate the (then) newly formed Specialist Community Disability Service (SCDS). The building now accommodates over 100 integrated staff, with clinic space and accessible meeting rooms for assessment and treatment services provided by the SCDS service. It also has sufficient space to continue to provide centre-based activities through the Day options Wellington House service. The building also hosts the manager of the (in-house) Outreach Short breaks service called Cherish, to organise volunteers and casual staff to support community based social activities and outings for young people with learning disabilities and Autism.

Budget Proposal for 2026/27 savings and Rationale for recommendation

3.5 A preliminary budget proposal went to Full Council on the 26th of February 2026 recommending the closure and reprovision of Wellington House Day Options. Despite increasing demand for services, Wellington House has been under-utilised, and the ageing building is not able to respond to the 21st expectations and increasingly complex care needs of those needing day opportunities. A decision was made to support the proposal pending the outcome of a 12-week formal consultation. A formal Consultation document was shared by the Director of Adult Social Care (please see Appendix 2).

3.6 Day services for the 21 individuals currently attending Wellington House Day options would be delivered by independent sector providers in the city. Each person would be matched to a new provider. Consideration of individual needs, preferences, and friendship groups will be informed by the outcomes of the full social care assessment reviews completed during April and May 2026.

3.7 As a local authority our overall costs are higher compared to areas that rely more on external providers. and this has an impact on the overall cost of our Learning Disability provision in the city. Local authority costs are higher as they include central support services such as HR, finance, IT, legal and governance requirements. Also, higher pension contribution and staff policy benefits. External providers typically operate with leaner management structures, lower employment costs (and minimise voids), with more flexible operating models.

3.8 Due to falling attendance, reduced demand and the associated high unit costs of running the Wellington House service, which currently averages £244 per day per person, it is no longer operating as an efficient, flexible, modern, day service to meet the needs of adults with learning disabilities in the city.

3.9 Paragraph 10.27 of the Care and Support Statutory Guidance issued under the Care Act 2014 states:
Financial resources are relevant when deciding how needs are met, but not whether eligible needs are met. In practice, this means that if there are two or more ways of achieving the agreed outcomes and meeting the person's eligible needs, the council can choose the option that represents the best value for money.

3.10 The building is not considered fit for purpose as a contemporary day opportunities facility. A substantial Victorian building, it was not designed to support the range and complexity of needs seen today and would require significant investment to adapt it to modern standards. The ageing infrastructure also requires increasing levels of maintenance, reducing the flexibility and efficiency of service delivery and limiting the building's capacity to meet future requirements.

3.11 Total Day opportunity placements provided across the city for Adults with Learning disabilities each year:

Year	Total new Learning Disability Day opportunity placements in the city each year	Wellington House placements each year
2025-26	37	0
2024-25	22	0
2023-24	12	1

3.12 A review of young people supported by Specialist Community Disability Service, who will transition from Children's Disability Service to Adult Social Care in the next two years has identified that there are 36 individuals. (Of the 36,2 individuals are likely to need day opportunities). These two young people's needs can be successfully met in the independent sector. They will require community -based support for young people.

3.13 The day opportunity needs of 16 to 17-year-old young people with Learning disabilities, transitioning to Adult Social Care, who may require an NHS Continuing Health Care (CHC) Checklist due to complex health and mobility needs, has also been analysed as requested by PaCC (Parent and Carer Council) and Amaze members. 6 individuals will require complex care service provision.

3.14 In terms of meeting day opportunity needs for this group, 4 of these young people are already in receipt of the required day opportunity provision, commissioned by the NHS Surrey and Sussex Integrated Care Board (ICB). The day opportunity needs of 2 of these young people will need to be met within complex day care provision should the ICB wish to commission the same. These figures were checked with the ICB. There was no available ICB data specific to Brighton and Hove City Council for all age groups at this time.

3.15 Externally provided day opportunities

3.15.1 Externally provided (independent sector) day opportunities play a vital role in meeting the needs of adults with learning disabilities in the city and their families. They provide meaningful activities and teaching daily living skills to enhance people's independence and help to provide much needed respite for those living at home with families or in shared lives placements. This enables people to remain living at home and reduces the need for more expensive full-time supported living or residential care placements.

3.15.2 There is a range of different day opportunity services that provide a range of activities across different venues and locations in the city. Some spaces are owned or leased by providers and some spaces utilise community-based

settings such as libraries and cafes.

3.15.3 Following a reduction in activity during the Covid-19 period, demand for day opportunities has again increased across the city. To ensure there is sufficient provision to meet current and future demand, the Council has continued to commission new day opportunity placements for adults with learning disabilities.

3.15.4 This commissioning activity is part of a broader, city-wide procurement programme and is entirely separate from the Wellington House proposal. The procurement process was approved by Cabinet on 13th February 2025 as part of the Council's Annual Procurement Forward Plan and has been progressing independently of any subsequent proposals relating to Wellington House.

3.15.5 As part of this programme, the Council undertook a recommissioning exercise for independent sector day opportunities providers. The first round of the procurement process concluded on 2nd July 2026, when bidders were informed of the outcome of their applications. Applications for this second round closed on 3rd August 2026 and are being evaluated in line with the approved procurement timetable.

3.15.6 The commissioning and procurement of additional day opportunity services has been planned and delivered as part of the Council's wider strategic approach to meeting increasing demand for services. It is not a consequence of, nor dependent upon, the Wellington House proposal, and would have proceeded regardless of the outcome of that proposal.

3.15.7 Data shared with the market as part of the recommissioning engagement from 2020-2025 showed the highest number of commissioned placements in day opportunities were for young adults. The largest number were for those aged 25-34, the second highest for those aged 19-24. We will need a flexible responsive cost-effective day opportunity market going forward to continue to be able to respond to these needs.

3.15.8 The recommissioning exercise updated the contracts and service specifications and increased the day opportunity provision in the city to meet increasing need. This was across 3 client groups:

- Adults with learning disabilities and who may also be autistic, and those with high care and support needs.
- Adults who are neurodivergent and who may also be autistic, and those with high care and support needs
- Adults with acquired brain injuries (ABI)

3.15.9 The outcome of the first round is that 5 of the 6 existing day options suppliers were awarded contracts to deliver support for adults with learning disabilities, with the addition of 3 new providers. There were 7 new applications for the second round of the day opportunities recommission for Lot 4 - high care and support needs. Commissioning is currently finalising the evaluation of these applications. Providers that are successful in passing the evaluation process will be added to the Day Opportunities contracted

provider list alongside those who were successful in round one.

3.15.10 Commissioning will continue to work with these providers, alongside any new providers entering the market, to increase available capacity, broaden service options, and ensure provision remains aligned with current and future levels of demand and identified needs. Indications from the 3 new providers are that one provider has costed 30 new places per day, one provider has costed 9 places per day and the other 16 places per day. This work will ensure increased choice in provision of up to around 55 new places per day in the independent sector market.

3.16 **The Process of the 12-week formal Consultation**

3.16.1 This section sets out the process and findings of the Formal consultation exercise. A formal Consultation document was shared (Appendix 2) on the proposal to close the Wellington House Day service.

3.16.2 The consultation was undertaken to inform Cabinet's consideration of the proposal to close Wellington House. Engagement was undertaken to understand the potential impact on people who use services, carers, staff and the wider community and therefore inform Cabinet's decision.

3.16.3 A comprehensive programme of consultation and engagement was undertaken with service users, families, carers, advocacy organisations, staff, elected members, commissioners and providers regarding the proposal to close Wellington House Day Service.

3.16.4 Engagement activities included a service user consultation exercise with Speak out Advocacy service, Learning Disability Partnership Board discussions, Speak Out Link Group engagement sessions, Parent and Carer Council (PaCC) and Amaze meetings, family and carer forums, Staff meetings. Engagement activities included face-to-face meetings with managers, Councillor Mitchie Alexander and the Learning Disability Day opportunity Commissioner.

3.16.5 The Council Your Voice platform was used to undertake Family and Carer surveys and Stakeholder surveys. The Survey was provided in both online and paper format for families and carers and in online and paper format for stakeholders where they were requested or required as a reasonable adjustment. A provider engagement event for families and carers was also arranged.

3.16.6 Stakeholders included people with Learning disabilities (Speak out Link Group), Wellington House families and carers, Speak Out advocates, Parent and Carers Council (PaCC) and Amaze, Wellington House staff, Specialist Community Disability Service staff, Commissioners, Care Providers and community representatives.

3.16.7 A comprehensive Equalities Impact Assessment has been completed (Appendix 3)

3.16.8 Separate feedback reports were received from Parent and Carer Council (Pacc) and Amaze (Appendix 4), Brighton and Hove Speak Out Link Group (Appendix 5) Unison (Appendix 6) and Chair of Governors Hill Park school (Appendix 7).

3.16.9 Consultation Engagement Timeline:

Date	Activity
1st April 2026	Service user and staff engagement visit; individual Care Act reviews begin.
14th April 2026	Formal consultation launched with families and carers, market engagement begins.
30th April 2026	Individual Care Act reviews completed
30th April 2026	Presentation to Learning Disability Partnership Board. Strategic partnership and co-production forum: Chaired by Speak Out Advocacy group and People with Learning disabilities. Attended by Community advocacy groups and representatives, Director of Adult social care, Heads of service 0-24 and 25+ Specialist Community Disability service, Commissioning, NHS representatives, Clinicians, Public health, Equalities.
7th May 2026	Speak Out advocacy discussions.
19th May 2026	PaCC and Amaze online session.
2nd June 2026	PaCC and Amaze face-to-face session.
9th June 2026	Parents/ Carers engagement with Councillor Alexander Mitchie.
30th June 2026	Additional family/carers session with Councillor Alexander Mitchie.
30th June 2026	Provider engagement event for families and carers.
7th July 2026	Formal consultation closes; market engagement concludes.

3.16.10 The summary of the detailed Engagement discussions is set out in Appendix 8.

3.16.11 During the formal 12-week formal Consultation from 14th April to 7th July two ‘Your Voice’ surveys were shared. One was for families and carers and one for other stakeholders. A detailed summary record of Your Voice Consultation was captured in Appendices 9 and 10.

3.16.12 **Families and carers survey.** The Survey was provided in both online and paper format for families and carers and in online and paper format for stakeholders where they were requested or required as a reasonable adjustment. There were 23 paper and online Family and Carers surveys submitted, and 56 paper and online Stakeholder surveys submitted.

3.16.13 **Stakeholder survey**. Responses came from a range of stakeholder organisations linked to adult social care, and the voluntary sector. The organisations named most often were SCDS (Specialist Community

Disability service). Responses also came from: NHS Trust Clinicians, carers, families, staff, and community organisations, Speak Out, Learning Disability Partnership Board, Speak Out Link Group, Parent and Carer Council (Pacc) and Amaze, Children's OT Team, UNISON, Grace Eyre, Hill Park school Head of Governors and The Rocket Artists.

3.16.14 In total there were 95 responses received and considered as part of the consultation from families and carers, staff, and organisations and other stakeholders. These responses are set out in detail in the appendices listed in this report.

3.17 **The Findings of the 12-week formal Consultation**

Engagement and consultation feedback has been reviewed collectively to identify common themes across responses families, carers, staff, providers, advocates, and wider stakeholders. This approach enables the report to reflect the breadth and depth of feedback received, while avoiding repetition across individual engagement activities.

3.17.1 The majority of those who responded to the consultation did not support the proposal to close Wellington House.

3.17.2 The feedback shows that Wellington House is highly valued as a familiar, specialist and trusted service for those that attend and the parents and carers that benefit from the service. Common themes included the importance of skilled and consistent staff, predictable routines, meaningful activities, concerns about the impact of change on Service Users, including increased anxiety and disruption to routines, concerns about whether alternative providers can meet individual needs.

3.17.3 The importance of friendships, peer relationships and social connection, the need for reassurance for families and unpaid carers, as the service provides essential respite for them, was also a key concern.

3.17.4 Respondents also raised significant concerns about uncertainty about the suitability of alternative provision, provider capacity, quality and staff skills, potential impact on families, unpaid carers and wider circles of support, transport arrangements and the need for careful transition planning and post-transition monitoring.

3.17.5 These themes identified through the consultation process were included in the Equality Impact Assessment, and would shape the focus on person-centred transition planning, provider assurance, accessible communication, advocacy, maintaining social connections where possible, supporting carers and monitoring the impact of any move after transition.

3.17.6 However, notwithstanding the majority of the feedback opposing the proposal to close Wellington House, the rationale for the proposal regarding the closure and reprovision of Wellington House still stands. This is due to the cost effective alternative ways that needs can met leading to a saving in the region of £330k, the falling occupancy, the condition and maintenance required of the building, and the confidence in the external Day Options Market to be able to accommodate the 21 people that attend Wellington House.

Next steps if the decision to close is agreed

3.18 The decision to move people would only happen when the council is satisfied that every one of the 21 people who currently attend Wellington House can have their day opportunity needs met locally with at least the same quality of care.

3.19 The individuals currently using this service have all received a statutory review of their individual needs under the Care Act 2014, and alternative day services to meet those needs would be commissioned through the independent sector market. Market engagement has confirmed that there will be sufficient places in the market to meet the required needs.

3.20 Following individual Care Act reviews and provider engagement activity, a clear reprovision pathway has been identified for all 21 people currently receiving support at Wellington House.

Number of Individuals	Reprovision Option	Notes
16	Reprovision to existing day opportunity providers with available capacity in the market.	Market engagement has confirmed sufficient current capacity to meet these individuals' assessed needs. Newly commissioned services are also bringing additional capacity into the city.
2	Support through a newly commissioned specialist high care needs service being developed by an existing provider.	Development of this service could also create additional capacity for other people in the city requiring day opportunities with high care and support needs.
2	No reprovision into day opportunities required due to a change in assessed need.	Care and support needs including Day opportunity needs would continue to be met throughout the transition period to alternative provision.
1	Increase in Direct Payment allocation.	Individual has expressed a preference to arrange support through a higher Direct Payment rather than attend a commissioned day opportunity service.

Wellington House provides transport for 8 individuals. The exact cost of replacing this is unknown, £25 per journey has been included, which is the average cost that some of the external providers charge.

The table below provides details of the annual cost of the Wellington House service, and the forecast cost if people receive services from alternative

providers and the anticipated savings per annum.

Annual Cost of Wellington House	Annual Cost of external provision	Saving per annum (full year affect)
£862,110 (assuming 3% uplift for 27/28)	£525,547 assuming full reprovision and travel costs	£336,563

- **Estimated saving (if closure proceeds):**

  £400,000 per annum was the initial estimated savings figure. Following Consultation and engagement with the external market the estimated saving through recommissioning of day support within the city inclusive of travel costs is £336,563 per annum.

  These savings will not impact on the quality of the alternative provision that will be commissioned to meet the assessed needs of the people currently using Wellington House Day options service.

3.21 Any alternative provision would need to demonstrate that it can meet the assessed needs of individuals currently attending Wellington House including those with complex support requirements, communication needs, behavioural needs, and health conditions.

3.22 If the closure of the service is agreed, then the Specialist Community Disability Service (SCDS) team and the manager of the Cherish service would be relocated to offices elsewhere. The property would then be released for a capital receipt.

3.23 There are currently six other providers of day services for adults with Learning disabilities in the city, which support 134 (86%) of the total 155 adults that receive day opportunity support. Their costs range from around £60 per day for someone with low needs to £199 per day for those with complex needs. Following the recommissioning exercise for day options another three providers have been identified as part of developing and expanding the day options market.

3.24 A six-week placement review would be completed for each person, to include feedback from the individual where they have the capacity to contribute along with families' carers, providers and other professionals involved in the person's care. Carers needs would also be considered at this time. There will also be an ongoing annual review

4. Analysis and consideration of alternative options

4.1 Suggestions for alternative options to the closure of Wellington House were shared as part of the consultation. These suggestions were assessed in terms of being effective and financially viable.

The alternatives broadly fall into six strategic options, and these are set out in the table below:

Alternative Option	Reasons Why This Is Not Assessed as Viable
1. Keep Wellington House and invest in the service	Attendance and referrals have reduced, resulting in unit costs increasing to an unsustainable level. The building itself is also unsustainable due to the increased costs associated with increasing levels of maintenance required.
2. Use Wellington House differently through expansion, specialisation, or shared use	Expanding, specialising, or introducing shared use would require additional investment and ongoing costs, with no evidence that demand would increase sufficiently to make the service financially sustainable. This option would increase financial risk without addressing declining attendance and referral or the concerns around the increasing building costs.
3. Transfer the service to another provider while retaining the building	The declining attendance and referral levels along with the costs related to building maintenance will affect the viability of the service regardless of who operates it. TUPE rules would also apply to any wholesale transfer of the staff team to another provider, which would significantly impact on any efficiencies that would be required.
4. Develop a hybrid model combining Wellington House and community-based provision	A hybrid model would increase operational complexity and increased operating costs. Due to the increased administration, resources required and cost of community-based provision. Given current attendance and referral levels, there is insufficient demand to justify retaining the building, making the option financially unsustainable.
5. Relocate the service intact rather than disperse it	Relocating the service would require an affordable building option within the city and would incur transition and relocation costs without addressing the primary issue of declining attendance and referrals.
6. Retain a smaller specialist	Maintaining a specialist council-run service would still require significant staffing and operational

Alternative Option	Reasons Why This Is Not Assessed as Viable
council-run provision while redesigning wider support arrangements	resources. Current and projected attendance and referral levels are too low to support a viable service, resulting in high costs per attendee and ongoing financial unsustainability.

5. Community engagement and consultation

5.1 There has been extensive Commnity Engagement and Consultation in relation to the Wellington House Budget proposal which has been set out in detail within the main body of the report and listed in the Appendices. This Report is also subject to People Overview and Scrutiny Committee on 4 September 2026, prior to Cabinet on 17 September 2026.

6. Financial implications

6.1 The recommended option is managed reprovision of day care and the closure of Wellington House. This is the only option that fully meets the needs of the existing clients in a sustainable way without increasing costs. The information below solely relates to the recommended option.

6.2 The individual needs and full cost of the reprovision of the services provided by Wellington House Day Service to the 21 clients would result in an ongoing, full year saving of £336,563:

Reprovision costs

Annual Cost of Wellington House	Annual Cost of external provision	Saving per annum (full year affect)
£862,110 (assuming 3% uplift for 27/28)	£525,547 assuming full reprovision and travel costs	£336,563

6.3 Should the closure be agreed, there would be a formal staff consultation process in line with the usual management of change procedures. Staff would be offered redeployment in the first instance, and vacancies have been held across the directorate - Adult Social Care and Housing services - to increase the likelihood of staff continuing to be employed by the council. Should this not be achievable then the range of potential staff redundancy costs has been indicated below:

Redundancy and pension costs for the 21 staff at Wellington House are corporately funded

Scenario 1 - 1/3 staff (7) redundant £191,728.22

Scenario 2 - 2/3 staff (14) redundant	£383,456.44
Scenario 3 - All staff (21) redundant	£575,184.66

6.4 The annualised saving of £336,563 is lower than the estimated £400k savings in the council's Medium Term Financial Plan (MTFP) for 2026/27. This is due to a requirement to potentially fund two accommodation placements as part of the outcome of the review process, which is a more expensive alternative to a day options placement. However, this still represents a significant saving of £1,009,689m across the remaining term of the MTFP to 31 March 2030.

Name of finance officer consulted: Brian Smith Date consulted 13/08/2026

7. Legal implications

7.1 At Budget Council on 26 February 2026 an indicative resourcing decision for savings was made that included a proposal to close Wellington House and re-provide day services. No decision was made to close Wellington House. Any decisions taken as part of the budget setting process are subject to compliance with relevant legal requirements, where appropriate, and do not constitute final approval of what sums of money will be saved under the budget proposals.

7.2 As described in the body of this report and its appendices, a consultation on the proposal to close Wellington House and re-provide day services was undertaken over a period of 12 weeks (in keeping with Government guidance). Established common law legal principles of fairness require that consultation must take place (i) when the proposal is still at a formative stage, (ii) sufficient reasons must be put forward for the proposal to allow for intelligent consideration and response, (iii) adequate time must be given for consideration and response and (iv) the results of consultation must be conscientiously taken into account.

7.3 The Council has a legal obligation to both manage public funds and meet eligible care and support needs of people living in its area (as defined in the Care Act 2014). As described in paragraph 3.9 in the body of this report the Care Act 2014 Statutory Guidance provides that financial resources are relevant when deciding how needs are met with the result that if there are two or more ways of achieving agreed outcomes and meeting the person's eligible needs, the council can choose the option that represents the best value for money. Section 5 of the Care Act 2014 requires the Council to promote the efficient and effective operation of a market in services for meeting care and support needs, ensuring people have a variety of providers to choose from who provide a variety of services.

Name of lawyer consulted: Sandra O'Brien Date consulted 19/08/2026

8 Equalities implications

8.1 The Council recognises that any significant service change may have implications for individuals attending Wellington House and their families and carers. A range of mitigation measures have therefore been identified within the Equality Impact Assessment to minimise potential impacts (Appendix 3). These include person-centred transition planning, accessible communication, advocacy support, social work involvement and ongoing engagement with families and carers.

8.2 Should Cabinet decide to support the recommendation to close the service, then we will undertake a full and formal consultation with the staff including an Equalities Impact Assessment to ensure all the impacts on the staff team are fully considered.

8.3 15 of the 21 people attending Wellington House are adults aged between 40 and 65 with 3 of these people being over 65 yrs of age. Any future provider would therefore be expected to demonstrate the skills and experience necessary to support adults with learning disabilities who may also be experiencing age-related health conditions, increasing frailty, or changing support needs.

8.4 Alternative providers would be required to demonstrate their ability to support and meet needs relating to:

- Learning disability support needs
- Autism-related support needs
- Communication and interaction needs
- Sensory support needs
- Positive behavioural support needs
- Physical disability, mobility, access, and personal care needs
- Mental health and emotional wellbeing needs
- Epilepsy, medication management, and other health-related support needs
- Age-related, deteriorating, or changing support needs.

All identified needs will are reflected in individual care and support plans. Service specifications, quality assurance arrangements, and contract monitoring processes would ensure services are responsive, person-centred, and outcomes focused.

9 Sustainability Implications

9.1 There are no direct Sustainability Implications identified as part of this report. The new contracts for Day Options provision as part of the recommissioning exercise will include the standard relevant references for providers regarding sustainable approaches to service delivery.

10 Conclusion

10.1 Following the feedback received through the formal consultation, officers have considered whether there is scope to retain Wellington House Day options service. Officers have listened to the valuable feedback received throughout the Consultation engagement meetings and through the Your Voice surveys. Consideration of the feedback shared during the consultation, the data related to service users, utilisation of the service, and finances leads to the conclusion that it is necessary to close the day service and to ensure that each service user transitions to a suitable alternative service within the external provider market. This proposal will meet the individual needs of the 21 people and achieve savings.

10.2 The Council recognises that any significant service change will have implications for individuals attending Wellington House and their families and carers. A range of mitigation measures have therefore been identified to support potential impacts.

10.3 Should the recommendation be approved then alternative provision will meet assessed needs and individualised transition plans would be implemented to minimise disruption and promote positive outcomes for individuals and their families. A follow-up six-week placement review would ensure that each person is provided with best support to enable a positive transition. This would be followed by an annual review. Carers assessments would be reviewed as part of the ongoing review process. Ongoing quality assurance and contract monitoring would provide assurance of good quality provision.

10.4 The council would ensure that the findings and actions required within the attached Equalities Impact Assessment (Appendix 3) are adhered to with the intention of providing support during the transition and ongoing new placement for individuals. For further details re Council response to the Consultation findings please see (Appendix 11) prepared for the benefit of cabinet.

Supporting Documentation

1. Appendices

Appendix	Title
Appendix 1	Extract from Previous Council report
Appendix 2	Formal Consultation Document
Appendix 3	Equalities Impact Assessment
Appendix 4	Parent Carer Council and AMAZE response
Appendix 5	Speak Out Link Group response
Appendix 6	Unison response
Appendix 7	Hill Park School response
Appendix 8	Council Response to Consultation feedback 1.

Appendix	Title
Appendix 9	Your Voice detail summary Parents and Carers
Appendix 10	Your Voice detail summary Stakeholders
Appendix 11	Council response to Consultation feedback 2.

Homes & Adult Social Care

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27 £'000
Homes & Adult Social Care **Adult Social Care**		
Community Care budget funding packages of care to meet statutory responsibilities across adult care groups including Learning Disability and Mental Health. Services include community support, home care, supported accommodation, residential and nursing care. - Physical Support & Sensory Support Memory & Cognition Support Mental Health Support Learning Disabilities 4,387 budgeted capacity for 2025/26	Summary of proposal: A new purpose-built accommodation ("Brickfields") for people living with physical disabilities and/or brain injuries. There are 28 apartments in total divided into flats and communal areas. The new accommodation will allow us to move people, where appropriate back to the city from more expensive accommodation. This is a positive development and may have the added benefit of bringing service users back to the city and closer to their families. Delivery risk & impact: Assumes service provision for new service will be outsourced and mobilisation of service is not significantly delayed. See EIA 9.	**300**
As above	Summary of proposal: Increased Community Reablement offer to support independence for individuals as an alternative or reduction in care & support needs Delivery risk & impact: None. See EIA 9.	**888**
As above	Summary of proposal: Reducing the demand for council run or council funded services by increasing signposting and redirecting of individuals at the first point of contact with the local authority. This will include utilising alternative offer such as community and voluntary provision in the city. Delivery risk & impact: None. See EIA 9.	**292**
As above	Summary of proposal: Continued focus on meeting care and support needs in alternative ways and in home settings, avoiding residential and nursing care placements. A particular focus on working age service users.	**816**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27 £'000
	Delivery risk & impact: None. See EIA 9.	
Learning Disabilities - In-house Services (Adults) - In-house Day Service In-house Residential In-house Respite Services In-house Shared Lives Service In-house Supported Living	Summary of proposal: Reprovision of in-house day services currently located in Wellington House. This would follow a statutory review of all service users' needs under the Care Act 2014. Reprovision would be sought in the independent and non-profit sector. If this proposal proceeds, Assessment staff would be relocated to office space elsewhere and the building repurposed or create a capital receipt. Delivery risk & impact: Net of reprovision costs within Community Care budget. Assessment staff to be relocated to office space elsewhere. Capacity in day options market to meet need. See EIA 10.	**400**
Adult Social Care Total		**2,696**
Commissioning & Partnerships		
Commissioning & Contracts - Adults Commissioning & Performance Team Executive Director Adult Services Safeguarding Team	Summary of proposal: Leadership Support Officer post deleted as part of redesign to strengthen support for Adult Social Care Improvement Plan Delivery risk & impact: This 0.6 FTE post has been vacant for the past year and impact on leadership support in ASC is mitigated via the functional alignment and delivery of leadership support via the Corporate Leadership Office	**23**
Commissioning & Partnerships Total		**23**
Housing People Services		
Temporary and Supported Accommodation - Temporary Accommodation	Summary of proposal: The budget for Temporary Accommodation is under severe financial pressure, with a forecast increase of £12m on the net General Fund. Four key workstreams are established, which will reduce the pressure, totalling £5.14m:	**5,143**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27 £'000
	• Increasing supply: of more affordable Temporary Accommodation (moving from spot to block-booked accommodation, exempt accommodation, EPC Grant Scheme and council owned TA) • Full Cost Recovery: Maximising full cost recovery for Temporary Accommodation costs. • Further improving effectiveness in prevention of homelessness: Reduce households placed in Temporary Accommodation with new Housing Advice Team. • Accelerating move on from Temporary Accommodation: direct offers of social housing to households in Interim Accommodation. Delivery risk & impact: Key risks include increasing demand for temporary accommodation, affordability constraints in the housing market and limited capacity in partner and support services to engage effectively in prevention work. These factors could impact the pace and sustainability of savings delivery and require close monitoring. See EIA 11.	
Housing People Services Total		**5,143**
Homes & Adult Social Care Total		**7,862**

Brighton & Hove City Council Adult Social Care

Formal Consultation on the Reprovision of Day Services for Adults with Learning Disabilities in Wellington House, Brighton



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1. Introduction:

Wellington House is A Day Centre for adults with learning disabilities in the Elm Grove area of Brighton & Hove and is open Monday to Friday, is closed weekends and is open 51 weeks of the year. It used to be exclusively used to provide day services for Adults with Learning Disabilities. In 2019, after the decision to create a whole life pathway by integrating the Children with Disabilities Team with the Adult Community Learning Disability Team, the building was divided into two parts to accommodate both the Day Service and the newly formed Specialist Community Disability Service.

The building now accommodates over a hundred staff and has sufficient space to continue to provide centre-based activities through the Day Options Day Service and access to clinic space and accessible meeting rooms for assessment and treatment services provided by SCDS.

There is also a Council provided Short Breaks service called Cherish that uses the building at weekends and evenings to provide social activities and outings for children and young people with learning disabilities and/or autism. This service employs a fulltime manager and uses volunteers to deliver the service.

The service is highly valued by those that use it and has a long-standing place in the community. The breakdown of the service is set out below:

Wellington House

Wellington House Day Service	Specialist Community Disability Service
Purpose: Provides a centre base for People with learning disabilities that offers social activities and skills learning as well as valuable respite for family carers. The building bases provides a secure and accessible environment for those whose needs cannot be fully met in community-based facilities. This Service runs 51 weeks of the year.	**Purpose**: This is an all-age service for children and adults with learning disabilities and children with disabilities. The Adult provision includes an integrated Specialist Health team as well as an Intensive Key working Team for children, young people and their families.

Attendance: Currently 21 adults with learning disabilities receive support from this service across the week, approximately half the attendees have complex needs and require high support to engage in activities. Due to the structure of the building the service is able to offer some discrete spaces for those people who struggle to share communal space, which in turn allow for a variety of activities to be provided at the same time. The service has an Autism accreditation from the National Autistic Society based upon support approach and environment.	**Attendance:** The building offers 4 clinic rooms to see patients on site and 2 social care conference rooms for meetings with people and/or their families. The main office provides 42 desks used on a hotdesking basis. The building has a shared entrance with the Day Centre, but with separate intercoms and waiting area for visitors, as well as a separate entrance/exit for staff.
Staffing Resource: • **Total Staff:** 21 • **Roles & Responsibilities:** o Centre Manager M11 1fte o Deputy Centre Manager SO1/2 1fte o Day Centre Officers Sc5 14.3fte o Drivers S4a 3.2fte (1.2 vacant)	**Staffing Resource**: ***Heads of Service*** x 2fte ***Pod 0 – 13*** 9.4fte ***Pod 14 – 24*** 11fte ***Pod 25+*** 17fte ***Specialist Clinical Team*** 15.2 fte (plus trainees) ***Shared Lives Team*** 3.8 fte ***Business Support*** 9.5fte ***Learning Disabilities and Autism Keyworker team*** 5fte ***Health Facilitator*** 1fte ***Children and Young Peoples Direct Payments officer*** 1fte
Total – 19.5 fte posts (21 employees on site)	**Total – 75fte (plus up to 10 trainees/students at any one time across the Service)**

Wellington House Day Options Day Centre:

Wellington House Attendance:

Attendance Numbers	People with complex needs	People with moderate needs	Total
Total number of people using Service	8	13	21*
People living with Family	4	5	9
People living in Shared Lives	1	3	4
People living in Care Services	3	5	8
Weekly Usage:			
People attending 5 days a week	5	3	8
People attending 3 days or less	3	10	13

A total of 12 to 13 people attend per day across Monday to Friday.

*There are an additional 4 other people who use the Centre on a Drop-In basis but bring their own support staff and are therefore not included in the table above nor the costs below.

Wellington House Budget/Costs:

- **Annual Budget Allocation:**
  £803,050
- **Breakdown:**
  - Staffing costs - £723,510
  - Non staffing costs - £79,540
- **Daily Rate:**
  On current attendance the average **daily rate is £220 per person** (actual cost for individual will vary according to level of supervision required).

However, over recent years, particularly since the Covid pandemic, attendance at the day centre has declined, with most adults with learning disabilities receiving their day support via the city's vibrant independent sector day options market. This has significantly increased the unit costs of running the day service which currently stand on average at £220.00 per day per person.

There are six other providers of learning disability day services for adults in the city which support 134 adults with learning disabilities of the total 155 adults with learning disabilities that receive day service support in the city – about 86% of the market share. Their costs range from around £60 per day for someone with low needs to £199 per day for those with complex needs. Of the 21 people who attend Wellington House around 9 have complex needs, the other people who attend have low to moderate needs.

Due to falling attendance and the high unit costs of running the service, Wellington House is no longer operating as an efficient, flexible, modern, day service to meet the needs of adults with learning disabilities in the city and now retains only a 14% market share of the day services market for the adult learning disability community. Brighton & Hove City Council is facing significant financial challenges, with Adult Social Care services having to deliver just over £10.1M of savings in 2026/27. As a council we have to balance the needs of our community against the limited resources we have and must ensure that the services we deliver are as cost efficient as possible.

At Full Budget Council on 26 February, the Council has taken a preliminary decision in relation to its budget only to support the proposal to reprovide the services as Wellington House, fully aware that no decision will be made to close the service or otherwise until a full consultation and detailed impact assessment has been undertaken. This will include an evaluation of the impact on those affected that attend the service, their families and carers, the services where people live and the staff that work at Wellington House.

2. What Are We Consulting On?

The budget proposal therefore is to close Wellington House Day Centre and re-provide day services for those 21 people who currently attend: based on both the declining economic viability of the service and confidence in the independent sector day service market to accommodate the needs of those individuals.

The aim of reproviding the service will be to ensure that those 21 people who receive day services at Wellington House continue to receive a high-quality, responsive day service that meets their individual needs and those of their parents and carers, through the independent day services sector in the city.

It is anticipated that, if a decision is made to close Wellington House following the formal consultation process, a saving of £400k can be achieved through re-commissioning day support for those individuals within the city.

If the decision is made to close the day centre it is also proposed that the building will be decanted by the SCDS team who will be accommodated in offices elsewhere, and the property released as a capital receipt to the council.

3. Why Are We Consulting?

Councillors are responsible for making decisions for the council, based on evidence, options and recommendations by officers who work for the council.

A preliminary budget decision only has been made subject to a full and formal consultation process. Holding the formal consultation gives those who may be directly affected by the proposal the opportunity to have their say and influence the decision that is made.

Those who may be indirectly affected, such as community organisations who support adults with learning disabilities and other stakeholders such as the Learning Disability Partnership Board are also encouraged to participate in the consultation and give feedback on the proposals.

During the consultation, participants will be able to request further information, ask questions and propose alternative options that have not been identified that may deliver on the required outcomes.

We will publish all the responses to the consultation in a report that will be presented and considered at the council's Cabinet Meeting in September, so that a fully informed decision can be made on the proposal to reprovide services at Wellington House:

The consultation commences on Tuesday 14 April and runs for 12 weeks ending on 7 July. The consultation timetable is set out below:

Consultation Timetable:

Date	Event
14 April 2026	Consultation Launch – Wellington House Day Centre
30 April 2026	Presentation at the Learning Disability Partnership Board
1 – 30 April 2026	Individual Reviews undertaken
14 April – 31 May 2026	Market Engagement with Independent Day Service Sector
14 April – 31 May 2026	Engagement with Community and Voluntary Groups including PaCC; Amaze; Carers Centre
1 June – 6 July 2026	Independent Sector Day Services engagement with Parents & Carers
7 July 2026	Formal Consultation closes
17 September 2026	Outcome report to Cabinet for a final decision

4. How Will We Consult?

Service users and parents/Carers & Stakeholders:

Firstly, we will take special care to ensure that the people who attend the day centre are consulted without causing distress, especially to those who might have difficulty understanding what is happening. We will discuss this with the people who know them best such as their relatives, carers, representatives and staff who work with them in the day centre. Within the formal consultation process, each person who attends Wellington House will have an individual review of their care and support needs to determine what alternative day service would meet those needs.

There will be a formal process to meet with families, carers, and other stakeholders to seek their views. We will use a digital platform called “Your Voice” as a way of gathering information and the views of all people potentially affected by the proposal. We acknowledge that any changes to this service may have a considerable impact on those who use it, as well as on carers and families. That’s why your perspective is so important to us.

To ensure we gather a thorough understanding of everyone’s views and concerns, and to hear any suggestions or ideas you may have about the proposed change, we will undertake the consultation via a survey that will be sent via email to all those affected by the proposal.

Should anyone need the survey via hard copy or in a more suitable format for their needs this can be arranged on an individual basis.

Staff:

Staff who work in the day centre will be able to participate in the Your Voice Consultation and will be a key part of individual service user reviews.

The separate formal staff consultation process regarding future employment options involving one-to-one meetings as part of the council’s Change Management process will only commence for day centre staff after Cabinet in September, should Cabinet decide to reprovide Wellington House.

The remaining staff who work in the building will be able to participate in the Your Voice Consultation.

5. What Are the Proposed Options Regarding Wellington House?

The proposed options for Wellington House are for the service to be re-provided within the independent sector learning disability day services market in the city, that already provides 86% of the day options for adult with learning disabilities. This means each individual who currently attend Wellington House will receive a day service from another provider in the city. Individual needs and preferences such as friendship groups will be considered as part of this process. Any alternative offer will need to be able to meet the needs of the 21 individuals who currently attend Wellington House Day centre. A summary of the providers and their current fees is set out below:

Current Independent Sector Market Rates:

Provider	Model	Fees	Capacity (if known)
1. Ambito	Building based. Supports those with complex physical and behavioural needs, can provide additional 1:1 support. Strong PBS offer. Can provide some transport	Day Fee £51.06 (with less than 3hrs 1:1) Day Fee £68.07 (if have more than 3hrs 1:1 1:1 hourly rate £23.48 PBS hourly rate £33.01 Transport £22	None at present
2. Aspirations Active	Building based. Supports those with complex behavioural needs who require focused support. Strong PBS offer.	 Schedule 3 Bandings Aspiration	Not known, anticipate limited if any
3. Down Syndrome Development Trust	Building based at Falmer University. Supports YP to increase their independence, work with students. Provide focused support sessions.	Day Fee £87.00	Exact not known. Anticipate some
4. Grace Eyre Foundation	Building based in a range of locations across the city. Support people with moderate needs who can be in a small group. Wide range of activities offered	Day Fee £72.52 Half day £36.25	Exact not known but do have capacity. Want to fill sessions

5. Team Domenica	Supports young people to increase their independence through learning of skills and experience – ie café/pub. Support into work placements	Day Fee £70.20	Exact not known but just opened new Pub
6. Rockets	Very small building base. Arts offer on 1:1 basis.	Day Fee £60.90 Half day £33.60	Very small, limited capacity.

Independent Sector Rates according to Need

Support need	Service model	Offer	Indicative Average Costs
Low/Medium needs	Activities shared with other individuals May be building based or in the community May support work opportunities	Sessions/half day Full day	£35 per session per day £70 per day
High need	Higher level of staff support required May need 1:1 support May need PBS offer from provider May need support with personal care/ health needs	Tends to be full days Tends to be building based though will include some activities in the community	£50 - £87 per day Additional cost on top could include 1:1/ PSB / Personal care Average cost of a service with a high support provider including 1:1, PBS, personal care, transport is £199 a day

As part of the consultation process all stakeholders and those who participate in the consultation process are invited to suggest alternative options for the day service at Wellington House. These will need to consider the financial challenges the council has to address in terms of efficiencies.

Many thanks for taking the time to read this document, we would be grateful for your participation in this consultation.

For Queries and further information please contact: hasccommunications@brighton-hove.gov.uk

General Equality Impact Assessment (EIA) Form

Support:

An EIA toolkit, workshop content, and guidance for completing an Equality Impact Assessment (EIA) form are available on the EIA page of the EDI Internal Hub. Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact the Equality, Diversity, and Inclusion (EDI) team by emailing Equalities@Brighton-Hove.gov.uk. If your request is urgent, please mention this in the subject line of your email so we can support as required.

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Team. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to the Equalities team by emailing the Equalities inbox and copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), any other relevant service colleagues to enable EIA communication, tracking and saving.
- Your EIA will be reviewed, discussed, and then approved by the assigned EDI Officer and after seeking additional approval as appropriate for your EIA.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the EIA toolkit for more information.

Name of activity or proposal being assessed:	Day Options for Adults with Learning Disabilities. Closure and Re-provision of Wellington House Day Options and transfer of support to commissioned external providers
Directorate:	Homes and Adult Social Care, Commissioning and Partnerships
Service:	Day Options Wellington House
Team:	Learning Disability Adult Provider service
Is this a new or existing activity?	New. The proposal has been agreed for Formal Consultation. A 12-week formal consultation ended 7th July
Are there related EIAs that could help inform this EIA? Yes or No (If	Should Cabinet decide to support the recommendation to close the Wellington House Day Options service, then the

yes, please use this to inform this assessment)	council would undertake a full and formal consultation with the staff including an Equalities Impact Assessment to ensure all the impacts on the staff team are fully considered.

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Kim Foster Operational Manager, Adult Learning Disability Provider Services
Accountable Manager:	Steve Hook Director, Adult Social Care
Additional stakeholders collaborating or contributing to this assessment:	Parents and Carers including Shared Lives carers, Wellington House Day Options staff, Speak Out Advocacy service, Learning Disability Partnership Board, Speak Out Link Group, Specialist Community Learning Disability Service, Sussex Partnership NHS Trust Specialist Clinicians, and Community organisations: The Carers Centre for Brighton and Hove, Parent Carers' Council (PaCC) and Amaze, Children's Occupational Therapy Team, UNISON, Grace Eyre, Hillside school Head of Governors and The Rocket Artists.

3. About the activity

Briefly describe the purpose of the activity being assessed:

Wellington House Day Options is a Day Centre for adults with learning disabilities in the Elm Grove area of Brighton & Hove and is open Monday to Friday, it is closed weekends and is open 51 weeks of the year. It used to be exclusively used to provide day services for Adults with Learning Disabilities and Autism. Currently 21 adults with learning disabilities receive support from this service across the week, 8 of the attendees have high needs, including complex needs, Autism, communication needs, sensory processing differences, behaviours that challenge, emotional wellbeing needs, mental health needs, epilepsy, and sight loss. Others attending have Moderate needs.

Four individuals also use Wellington House as a drop in option with their staff on some days of the week.

Staff are trained in positive behavioural support and receive training in autism awareness and using appropriate communication and support strategies. The service has an Autism accreditation from the National Autistic Society awarded 2020 based upon support approach and environment.

The service provides support for autistic individuals and positive behavioural support needs. It is not commissioned to support individuals whose needs include complex health or mobility requirements.

Purpose

Wellington House provides a centre base for people with learning disabilities that offers social activities and skills learning as well as valuable respite for family carers.
The building base provides a secure and accessible environment for those whose needs cannot be fully met in community-based facilities.

The service is highly valued by those who attend the service. Families, carers and staff are concerned about the potential impact of the proposal to close. They believe closure would have substantial negative impacts on wellbeing, stability, and inclusion for people with learning disabilities and their families, while questioning whether alternative provision has sufficient capacity or specialist expertise to meet people's needs.

Due to the structure of the building and the current level of attendees the service is able to offer some discrete spaces for those people who struggle to share communal space, which in turn allows for a variety of activities to be provided at the same time.

In 2019, after the decision to create a whole life pathway by integrating the Children with Disabilities Team with the Adult Community Learning Disability Team, the building was divided into two parts to accommodate both the Day Service and the newly formed Specialist Community Disability Service.
The building now accommodates over a hundred staff and has sufficient space to continue to provide centre-based activities through the Day Options Day Service and access to clinic space and accessible meeting rooms for assessment and treatment services provided by Specialist Community Disability Service (SCDS).

There is also a council provided Short Breaks service called Cherish that uses the building as an office base for the manager to organise community based social activities and outings for children and young people with learning disabilities and/or autism. This service employs a full-time manager and uses volunteers to deliver the service. Those supported by Cherish are picked up from home to engage in community-based activities.
The service is highly valued by those that use it and has a long-standing place in the community.

At the Full Budget Council meeting held on 26th February, the Council made a preliminary decision in relation to its budget proposals. Part of this indicative resourcing decision included a proposal to close the Wellington House Day Options Service for Adults with Learning Disabilities and Autism, with day support to be re-provided through external commissioned provision. A copy of the relevant Council report can be found at: (Appendix 1) of the report Brighton & Hove City Council - Choose agenda document pack - Council 26 February 2026 on page 52.

This budget proposal was developed as part of the Council's budget-setting process and is intended to contribute towards achieving the required financial savings to achieve a balanced budget whilst the council continues to meet its statutory duties and the assessed needs of service users. No decision could be made on the proposal until a full consultation was undertaken with those potentially affected.

A consultation ran between 14th April and 7th July 2026, and the outcome of the consultation is set out in the report.

- **Proposal -** to close Wellington House Day Centre and re-provide day services for the 21 people who currently attend.
- Re-provide support through the independent sector learning disability day services market in the city.
- Each person currently attending Wellington House would receive a day service from another provider in the city.
- Matching would consider individual needs and preferences, including friendship groups.
- The move ahead on re-commissioning provision will only happen when the council is satisfied that every one of the 21 people who currently attend Wellington House can have their day opportunity needs met locally still with at least the same quality of care.
- Consultation also invited suggestions for alternative options – these must be viable and consider the council's financial pressures and need for efficiencies.
- Aim: ensure people continue to receive a high-quality, responsive day service that meets individual needs (and supports parents/carers).
- If the day centre closes, it is also proposed that:

  The Speciality Community Disability Service (SCDS) team and the Manager of the Cherish service will be decanted to offices elsewhere.

  The property will be released as a capital receipt to the council.
- Over recent years, particularly since the Covid pandemic, attendance at the day centre has declined, with most adults with learning disabilities receiving their day support via the city's vibrant independent sector day options market. This has significantly increased the unit costs of running the day service which currently stand on average at £244 per day per person.
- Due to falling attendance, reduced referrals and the high unit costs of running the service, Wellington House is no longer operating as an efficient, flexible, modern-day service to meet the needs of adults with learning disabilities in the city and now retains only a 14% market share of the day services market for the adult learning disability community. Brighton & Hove City Council is facing significant financial challenges, with Adult Social Care services having to deliver just over £10.1M of savings in 2026/27. As a council we must balance the needs of our community against the limited resources we have and must ensure that the services we deliver are as cost efficient as possible.
- The building is no longer considered fit for purpose as a contemporary day opportunities facility. A substantial Victorian building, it was not designed to support the range and complexity of needs seen today and would require significant investment to adapt it to modern standards. The ageing infrastructure also requires increasing levels of maintenance, reducing the flexibility and efficiency of service delivery and limiting the building's capacity to meet future requirements.

- Estimated saving (if closure proceeds): £400,000 per annum was the initial estimation. Following Consultation and engagement with the external market the estimated saving through recommissioning of day support within the city inclusive of travel costs is £336,563 per annum.
- These savings will not impact on the quality of the alternative provision that will be commissioned to meet the assessed needs of the people currently supported at Wellington House Day options service.
- There are six other providers of learning disability day services for adults in the city which support 134 adults with learning disabilities of the total 155 adults with learning disabilities that receive day service support in the city – about 86% of the market share. Their costs range from around £60 per day for someone with low needs to £199 per day for those with complex needs. Of the 21 people who attend Wellington House 8 have complex needs, the other people who attend have moderate needs.
- The individuals currently using this service have all received a statutory review of their individual needs under the Care Act 2014, and alternative services to meet those needs will be commissioned through the independent sector market.

What are the desired outcomes of the activity?

- To close Day Options Wellington House through a carefully managed transition and closure process and purchase suitably qualified and experienced providers to ensure that all Wellington House Service Users will receive an equivalent support and care which meets their needs elsewhere.
- It has been established that there would be minimal impact on the Cherish service. The Manager of the service would need to be decanted to an alternative base. They would be able to continue to manage the community-based service from an alternative office base.

Rationale

- As a local authority our unit costs are higher compared to areas that use more external provision. The increased unit costs of Wellington House Day Options have an impact on the overall cost of our Learning Disability provision in the city.
- We know that financial sustainability is a challenge shared by other local authorities across the country, and we are committed to managing it responsibly. That's why we regularly review our in-house services to make sure they align with our strategic priorities and deliver support in the most cost-effective way.
- These reviews help us plan, so we can continue supporting a growing number of people with learning disabilities who need care in our city.
- Over recent years, particularly since the Covid pandemic, attendance at the Wellington House Day Centre has declined, some individuals did not return to the service due to their individual circumstances or health needs and referrals have declined to 4 in 2024 and 3 in 2025. These referrals did not translate to placement as the referral was agreed but not taken forwards by the referee due to alternative available arrangements being taken forwards.

- The building is no longer considered fit for purpose as a contemporary day opportunities facility. A substantial Victorian building, it was not designed to support the range and complexity of needs seen today and would require significant investment to adapt it to modern standards. The ageing infrastructure also requires increasing levels of maintenance, reducing the flexibility and efficiency of service delivery and limiting the building's capacity to meet future requirements.

- Most adults with learning disabilities are currently receiving their day support via the city's vibrant independent sector day options market. This has significantly increased the unit costs of running the day service which currently stand on average at £244 per day per person.

- There are six independent sector providers of learning disability day services for adults in the city which support 134 adults with learning disabilities of the total 155 adults with learning disabilities that receive day service support – about 86% of the market share. Their costs range from around £60 per day for someone with low needs to £199 per day for those with complex needs. Of the 21 people who attend Wellington House around 8 have complex needs, the other people who attend have Moderate needs. 4 people also attend drop ins at Wellington House supported by staff from home.

- Due to falling attendance, reduced demand and the high unit costs of running the service, Wellington House is no longer operating as an efficient, flexible, modern, day service to meet the needs of adults with learning disabilities in the city and now retains only a 14% market share of the day services market for the adult learning disability community. Brighton & Hove City Council is facing significant financial challenges, with Adult Social Care services having to deliver just over £10.1 million of savings in 2026/27. As a council we must balance the needs of our community against the limited resources we have and must ensure that the services we deliver are as cost efficient as possible, while meeting people's needs.

- A review of the day opportunity needs of 16- and 17-year-olds supported by the Specialist Community Disability Service (SCDS) has identified an overall projected reduction in demand for day opportunity provision across the city for this cohort as they transition to adult services.

- Based on current projections, only two young people across this cohort are likely to require a new formal Day Opportunity placement, these two young people's needs can be successfully met in the independent sector as they are requiring community-based support for young people.

- Externally provided day opportunities continue to play a vital role in meeting the needs of adults with learning disabilities in the city and their families. They provide meaningful activities and skills teaching to enhance people's independence and help to provide much needed respite for those living at home with families or in shared lives placements. This enables people to remain living at home and reduces the need for more expensive full-time supported living or residential care placements.

- There are a range of different day opportunity services that provide a great range of activities across different venues and locations in the city. Some spaces have been specifically sourced by providers for their own use, and some spaces utilise community-based settings such as libraries and cafes.

- Data confirms that we continue to commission new day opportunity placements for adults with learning disabilities every year. Following a reduction in activity during the Covid-19 period, the demand has increased, particularly over the last two years. Most placements continue to be for young adults aged 25-34 with increasing number of placements also being commissioned in the 19-24 age range and above 34 years of age. We will need a flexible responsive cost-effective day opportunity market going forward to be able to respond to this need.

- A recommission of Day Opportunities has recently been undertaken by the Adult Social Care Commissioning team. This process was agreed at Cabinet on 13th February 2025 as part of the annual procurement forward plan (and unrelated to the subsequent proposal to close Wellington House). The reason for this was to update the contracts and service specifications and to increase the day opportunity provision in the city to meet need. This was across 3 areas of commissioning including:
  - Adults with learning disabilities and who may also be autistic, and those with high care and support needs.
  - Adults who are neurodivergent and who may also be autistic, and those with high care and support needs
  - Adults with acquired brain injuries (ABI)

- The outcome of the first stage of the recommission is that 5 existing suppliers were awarded contracts to deliver support for adults with learning disabilities, with the addition of 3 new providers. A second round of applications is currently being evaluated, with 7 applications.

Reprovision
Following individual reviews and provider engagement activity, a clear reprovision pathway has been identified for all 21 people currently receiving support.

For the majority of individuals (16 people), support would be reprovisioned through existing day opportunity providers that have available capacity within the local market. Engagement with providers has confirmed that there is sufficient capacity to meet these individuals' assessed needs, enabling continuity of support through established services.

A further 2 individuals have been identified as requiring support through a newly commissioned specialist service for people with high care and support needs. This service is being developed by an existing provider and, in addition to meeting the needs of these individuals if required, it is expected to increase capacity across the city for other people who require more specialist day opportunity provision.

For 2 more individuals, reprovision into day opportunities is not required due to changes in their assessed needs.

The remaining 1 individual has expressed a preference to receive an increased Direct Payment allocation rather than access a commissioned day opportunity service. Subject to the necessary arrangements being put in place, this would enable them to organise support in a way that best meets their personal circumstances and preferences.

- Wellington House provides transport for 8 individuals. The exact cost of replacing this is unknown, £25 per journey has been included, which is the cost that some of the external providers charge.

- The paragraph below provides details of the current annual cost of the Wellington House service, the cost if people receive services from alternative providers and the anticipated savings per annum.

The current annual cost of operating the Wellington House service is £862,110 (assuming 3% uplift for 2027/28). If the support for the individuals currently supported by the service is reprovisioned to alternative providers, the estimated annual cost of this external provision would be £525,547. Based on these figures, the reprovision proposals are expected to deliver a significant reduction in annual expenditure, with anticipated full-year savings of £336,563.

Which key groups of people do you think are likely to be affected by the activity?

The individuals who are likely to be affected by this activity are those currently supported by Wellington House Day Options who are adults with learning disabilities, some of whom are also autistic, and their families and circles of support.

The number of individuals affected within the Wellington House Day Options service is 21 placements and 4 drop in attendees.

Staff working at Wellington House will also be affected by the proposal. Should Cabinet decide to support the recommendation to close the service, the Council would undertake a full and formal consultation with the staff including an Equalities Impact Assessment to ensure all the impacts on the staff team are fully considered. This will include the Manager of Cherish community based service who is based in the building.

If the decision is made to close the service, this will have an impact on the Specialist Community Disability Service (SCDS) staff who are also based in the building. A separate EIA will be in place to look at the impact of this on SCDS staff.

This EIA however is addressing the impact on the people using these services and their family carers.

This EIA also considers the potential impact on young adults in the city whose needs could be met within the current Day Options provision as they transition to adult services in the next two years.

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

Consultation and Engagement Timetable:

14th April 2026
In-person formal consultation launched with families and carers at Wellington House Day Centre
Attendees: 16 family members and carers, Director of Adult Social Care, Commissioner of Adult Learning Disability Day Opportunity services.

1st April to 30th April 2026
Individual reviews undertaken as part of consultation/engagement.
Participants: All people supported at Wellington House, social workers, key workers, managers, family members, and carers.

Friendships and relationships have been captured within individual reviews and commissioners and social work managers are aware of the groupings that would like to stay together with any new proposed reprovision.

14th April to 7th July 2026
Market engagement with independent day service providers
Participants: Adult Learning Disability Day Opportunity Commissioner, Independent sector day opportunity providers

30th April 2026
Presentation to the Learning Disability Partnership Board
Attendees: Learning Disability Partnership Board Members, Director ASC, Commissioner, Operational Manager Adult Learning Disability Provider Services

1st April 2026
Service user and staff engagement visit

- An overview of the service, including who attends and the support provided
- Councillor Alexander had a tour of the service and observed two sessions in progress.
- She also met with a small group of staff, giving her the opportunity to ask questions about the service.
- Councillor Alexander was also shown a video produced by the Out and About Art Group, which documented a collaboration with a local artist to create a mobile and showcased the development of the project.

Attendees: Councillor Mitchie Alexander, Director of Adult Social Care, Learning Disability Day Opportunity Commissioner, Operational Manager and Manager of the service, Staff members, People using the service.

7th May 2026
Speak Out advocacy discussions with people supported at Wellington House
Participants: Speak Out Advocacy, staff, managers, representative group of people supported by the service.

- Following discussions with families, carers, social workers, clinicians and Speak Out Advocacy, a proportionate approach has been adopted regarding communication with individuals currently attending Wellington House. Concerns were raised that discussing proposals before any formal decision has been made could create significant anxiety and uncertainty, particularly for some autistic adults and people with limited capacity to understand the decision-making process.
- Should the proposal proceed, information would be provided in accessible and personalised formats, including Easy Read materials, visual communication tools, Makaton, and social stories where appropriate. Independent advocacy support would also be available to support individuals through any transition process

19th May 2026
Parent Carers' Council (PaCC) and Amaze online engagement session (held in the evening to improve accessibility)

Attendance:10 family members and carers. Director ASC, Commissioner, Operational manager.

2nd June 2026
Parent Carers' Council (PaCC) and Amaze face-to-face engagement session
Attendees: 9 family members and carers, Director ASC, Commissioner, Operational manager., Councillor Mitchie Alexander

9th June 2026
Wellington House Parents and carers engagement session with Councillor Mitchie Alexander
Attendees: 13 family members and carers, Councillor Mitchie Alexander, Director ASC, Operational manager.

30thJune 2026
Additional Wellington House family and carers engagement session.
This session was arranged to ensure all families and carers had an opportunity to attend a follow up meeting with Councillor Alexander.
Attendees: 8 family members and carers, Councillor Mitchie Alexander, Operational manager.

30th June 2026
Independent sector day services engagement with parents and carers of people supported at Wellington House
Attendees: 8 family members and carers, representatives from 6 independent provider organisations

7th July 2026
Formal consultation closes. People were consulted on Your Voice surveys both online and in accessible paper form and through engagement activity face to face meetings with managers Councillor Mitchie Alexander and the Learning Disability Day Opportunity Commissioner.

Speak Out Advocacy service. Parent Carers' Council (PaCC), Amaze and The Learning Disability Partnership Board Speak Out Link Group were also involved in engagement activity.

14th April to 7th July 2026
Survey activity
Responses received:

- Family and carer survey (online and paper): 23 responses
- Stakeholder survey: 62 responses (online and paper).

Engagement Activity 1: Speak Out Engagement – Wellington House Service Users

Date: 7th May 2026
Participants: Service Users

This consultation has focused on a sensitive proposal affecting people supported at Wellington House. Throughout the process, extensive engagement has taken place with families, carers, staff, social workers, advocacy organisations, and representatives of the wider learning disability community to ensure that views and concerns are fully understood and reflected.

Following discussions with parents, carers, and social workers, it was agreed that people supported at the service would not be informed of the proposal at this stage. Families and carers raised concerns that discussing potential closure plans before any decision had been made and without the ability to provide clear reassurance about future arrangements, could cause

significant anxiety and distress, particularly for autistic individuals, It was therefore agreed that, if a formal decision is made, information would be shared at the appropriate time and in a way that is tailored to each individual's communication and support needs.

Speak Out were able to support engagement and completed a visit to the service to consult on what was important to attendees, things they enjoy and friendships. Speak Out were able to complete their report without referencing the potential closure plans.

Key findings:

Feedback from service users was overwhelmingly positive. Participants consistently described Wellington House as a place they enjoy attending, using phrases such as:

- "I love it."
- "It's fun."
- "It's good. I love it."
- "When I walk through the door, I feel happy."
- Most surveyed individuals selected positive emotional responses when asked about their experience of the service.
- Strong satisfaction with the service and positive emotional responses.
- Friendships and social connections are highly valued.
- Staff recognised as caring, knowledgeable and responsive.
- Meaningful activities and community participation are highly valued.
- Routine, familiarity and stability support wellbeing.

Summary: Service users expressed overwhelmingly positive views and highlighted the importance of relationships, routine, and specialist support.

Friendships and relationships have been captured within individual reviews and commissioners and social work managers are aware of the groupings that would like to stay together with any new proposed reprovision.

Any new provider would need to assure that they will provide valued meaningful activities and community participation through a scheduled week of activities devised to meet the needs and desires of the group supported.

Engagement Activity 2: Learning Disability Partnership Board

Date: 30th April 2026
Participants: Partnership Board Members

Key findings

- Discussion of financial rationale for proposal.
- Concerns regarding service continuity and future demand.
- Concerns regarding market capacity and complex needs provision.
- Need to be evidence regarding alternative provision.

Summary: Members emphasised the importance of ensuring future provision can meet current and future demand.

Engagement Activity 3: Parent Carers' Council (PaCC) and Amaze

Date: 19th May and 2nd June 2026
Participants: Parent Carers' Council (PaCC) Members and Stakeholders

Key findings

- Financial savings versus service quality.
- Capacity and suitability of alternative provision.
- Future demand for services.
- Impact on individuals and families.
- Trust, transparency, and consultation integrity.

Summary: Parent Carers' Council (PaCC) and Amaze requested robust evidence that alternative provision can safely replicate current outcomes.

Engagement Activity 4: Learning Disability Partnership Board Link Group - focused discussions

Date: 8th June 2026
Participants: People with lived experience

Key findings

- Strong opposition to closure.
- Concerns regarding loss of community and belonging.
- Impact on wellbeing and independence.
- Need for accessible communication and advocacy.

Summary: The response from Speak Out Link Group Peer Advocates demonstrates strong concern about the loss of a valued community resource, uncertainty about the suitability of alternative provision, and fears regarding the impact on wellbeing, social inclusion, and support networks. Respondents consistently emphasised themes of community, continuity, fairness, and protecting vulnerable people from further disadvantages.

Engagement Activity 5: Family and Carer Engagement Meeting

Date: 9th June 2026
Participants: Families and Carers

Key findings:

- Continuity of care and transition planning.
- Provider quality and capability.
- Support for people with complex needs.
- Market capacity and value for money.
- Alternative options to closure.

Summary: Families and carers sought reassurance regarding quality, safety, and continuity.

Engagement Activity 6: Provider Engagement Event

Date: 30th June 2026
Participants: Providers, Families and Carers

Key findings

- Providers outline service models and capacity.
- Families met providers and discussed support options.
- Some service visits arranged on request of carers

Summary:

- The Provider engagement meeting on 30th June provided an event for families and carers to meet and discuss the "potential" day opportunity provision options with the independent day service providers in the city, that are referenced as part of the formal consultation document. To ensure that everyone is fully informed about the Provider Market and what is available, to support engagement with the formal consultation.
- On the day Providers were able to discuss their current capacity and ability to expand their capacity to meet proposed demand. They were also able to discuss usual practice of working to capacity, and not operating with vacancies, as it would not be financially viable for them to employ staff and run with vacancies. Leaflets with written information on each service were available to share with attendees.

Engagement Activity 7: Family and Carer meeting with Councillor Mitchie Alexander

Date: 30th June 2026
Participants: Families and Carers

Summary: Why Wellington House is being considered for closure and whether alternative savings are available. Impact on long-term service users, many attending for decades. Concerns about trust, previous promises, and consultation transparency. Loss of choice, specialist provision, and suitable alternatives. Potential false economy due to increase in respite and residential care costs. Calls to improve and modernise the service rather than close it.

During the formal 12-week Your Voice consultation from 14th April to 7th July two surveys were shared: one for families and carers and one for other stakeholders

A detailed, summary record of Your Voice Consultation was captured in appendices 9 and 10 of the Council report.

Families and carers survey.

The Survey was provided in both online and paper format for families and carers and in online and paper format for stakeholders where they were requested or required as a reasonable adjustment.

Responses:

Family and Carers Survey Response rates:

Surveys submitted both paper and online 23

Stake holder Survey Response rates:

Surveys submitted both paper and online 56

Stakeholder survey Responses:

Responses came from a range of stakeholder organisations linked to adult social care, health, carers, advocacy, and the voluntary sector. The organisations named most often were SCDS / or other related services. Other respondents represented carers, families, staff, and community

organisations: The Carers Centre for Brighton and Hove, PaCC and Amaze, Children's OT Team, UNISON, Grace Eyre, Hillside school and The Rocket Artists

Review of Day opportunity needs of young people transitioning to adult services:

A review of the day opportunity needs of 16- and 17-year-old young people currently supported by the Specialist Community Disability Service (SCDS) has identified an overall projected reduction in demand for day opportunity provision across the city for this cohort, who already have established support arrangements in place, therefore they will not require a building-based Day opportunity placement as they reach adulthood. 2 people that will require Day opportunities will need community-based provision for young adults.

The Day opportunity needs of 16- to 17-year-olds currently supported by the Specialist Community Disability Service who may require a Continuing Health Care (CHC) Checklist at Adulthood due to complex health and mobility was also analysed at the request of Parent Carers' Council (PaCC) and Amaze parents.

In terms of meeting day opportunity needs for this group, 4 of these young people are already receipt of the required day opportunity provision. The day opportunity needs of 2 of these young people will need to be met within complex day care provision should the ICB wish to commission the same.

These figures were checked with the Surrey and Sussex Integrated care Board (ICB). There was no available ICB data specific to Brighton and Hove for all age groups at this time.

Commissioning: External provision, Day Opportunity Provider Engagement:

The council is working with six main providers of day opportunities for adults with learning difficulties in the city.
These Providers support people with varied needs, some of whom support people with complex needs. BHCC has also undertaken recommissioning with current providers and have attracted three new providers to the city.

Current Independent Sector Adult Learning Disability Day opportunity providers:
Externally provided day opportunities play a vital role in meeting the needs of adults with learning disabilities in the city and their families. They provide meaningful activities and skills teaching to enhance people's independence and help to provide much needed respite for those living at home with families or in shared lives placements. This enables people to remain living at home and reduces the need for more expensive full-time supported living or residential care placements.

There are a range of different day opportunity services that provide a great range of activities across different venues and locations in the city. Some spaces have been specifically sourced by providers for their own use and some spaces utilise community-based settings such as libraries and cafes.

Data confirms that we continue to commission new day opportunity placements for adults with learning disabilities every year. Following a reduction in activity during the Covid-19 period, the demand has increased, particularly over the last two years. Most placements continue to be for young adults aged 25-34 with increasing number of placements also being commissioned in the 19-24 age range and above 34 years of age. We will need a flexible responsive cost-effective day opportunity market going forward to be able to respond to this need.

A recommission of Day Opportunities has recently been undertaken by the Adult Social care Commissioning team. This process was agreed at Cabinet on 13th February 2025 as part of the annual procurement forward plan. The reason for this was to update the contracts and service specifications and to increase the day opportunity provision in the city to meet need. This was across 3 areas of commissioning including:

- Adults with learning disabilities and who may also be autistic, and those high care and support needs.
- Adults who are neurodivergent and who may also be autistic, and those with high care and support needs
- Adults with acquired brain injuries (ABI)

The outcome of the first stage of the recommission is that 5 existing suppliers were awarded contracts to deliver support for adults with learning disabilities, with the addition of 3 new providers. A second round of applications is currently being evaluated, with 7 applications.

Engagement and consultation
Engagement and consultation feedback has been reviewed collectively to identify common themes across responses from people supported by Wellington House, families, carers, staff, providers, advocates and wider stakeholders. This approach enables the EIA to reflect the breadth and depth of feedback received, while avoiding repetition across individual engagement activities.

A detailed summary record of the consultation and engagement feedback, including responses from families, carers, staff, advocates, Speak Out link Group, providers and wider stakeholders, was captured in the Appendices 4,5,6,7,8 9 and 10 to the Council report.

The feedback shows that Wellington House is highly valued as a familiar, specialist and trusted service. Common themes included the importance of skilled and consistent staff, predictable routines, meaningful activities, concerns about the impact of change on Service Users, including increased anxiety and disruption to routines, concerns about whether alternative providers can meet individual needs, the importance of friendships, peer relationships and social connection, need for reassurance for families and unpaid carers, as the service provides essential respite for them, and need for their involvement in decision-making. Respondents also raised significant concerns about uncertainty about the suitability of alternative provision, provider capacity, quality and staff skills, potential impact on families, unpaid carers and wider circles of support, transport arrangements and the need for careful transition planning and post-transition monitoring. These themes have directly informed the mitigation measures and action plan within this EIA. In particular, they have shaped the focus on person-centred transition planning, provider assurance, accessible communication, advocacy, maintaining social connections where possible, supporting carers and monitoring the impact of any move after transition.

As part of the consultation process all stakeholders and those who participated in the consultation process were invited to suggest alternative options for the day service at Wellington House. These would need to consider the financial challenges the council has to address in terms of efficiencies.

Below is a summary of the proposals put forwards as part of the consultation:

The alternatives broadly fall into six strategic options:

1. Keep and invest in Wellington House.
2. Use Wellington House differently through expansion, specialisation or shared use.
3. Transfer operation to another provider while retaining the building.
4. Develop a hybrid model combining Wellington House and community-based provision.
5. Relocate the service intact rather than disperse it.
6. Retain a smaller specialist council-run provision while redesigning wider support arrangements.

These themes capture virtually all proposals raised through consultation while removing duplication and highlighting the strategic choices available.

The alternatives proposals shared within the Consultation are not assessed as viable and would not address the financial challenges the council has to address in terms of efficiencies.

Wellington House Day Opportunities Service: Council response to consultation feedback:

Maintaining friendships, relationships and support networks

- The importance of friendships, relationships and established support networks was a consistent theme throughout the consultation process. Information regarding significant friendships and social connections has been captured through individual Care Act reviews. Commissioners and social work managers are aware of individuals who have expressed a preference to remain together should alternative provision be required. This information will inform any future transition planning.
- Should the proposal proceed, any alternative provider would be required to demonstrate how it will maintain and support social inclusion and community participation. Providers would also be expected to deliver meaningful, person-centred activities that reflect the interests, aspirations, and support needs of those attending the service.

Transition arrangements and individual support

- No final decision has been made regarding the future of Wellington House. Should Cabinet approve the proposal, a comprehensive and person-centred transition process would be implemented for each individual currently attending the service. This process would involve families, carers, social workers, health professionals, and providers to ensure that individual needs and preferences are fully considered.
- Transition planning would include consideration of friendship groups, communication needs, health requirements, and personal outcomes. Where appropriate, capacity assessments and best-interest decision-making processes would be undertaken in accordance with the Mental Capacity Act 2005. Independent advocacy support would be available where indicated. A six-week placement review would be undertaken, followed by an annual review or sooner if required to meet a change in needs. Carer assessments would be reviewed as part of the review process.

Alternative Day Opportunity provision

- The proposal would involve reprovisioning support through independent sector day opportunity providers operating within the city. Currently, approximately 86% of day opportunities for adults with learning disabilities are provided through the independent sector. Should the proposal proceed, all individuals currently attending Wellington House would continue to receive equitable Day opportunity provision.

- Any alternative provision would be required to demonstrate that it can meet the assessed needs of individuals currently attending Wellington House, including those with complex support requirements, communication needs, behavioural needs, and health conditions.
- Updated contract specification requirements and contract reviews would provide additional ongoing monitoring and assurance.

Current and future demand

- There have been declining referrals to Wellington House in 2024 and 2025.

- A review of the day opportunity needs of 16- and 17-year-olds supported by the Specialist Community Disability Service has identified an overall projected reduction in demand for day opportunity provision across the city for this cohort. Across both cohorts (36 young people) there were 2 projected Day Opportunity placements required these needs can be met within community-based provision for young adults.

- Most day opportunity placements in the city continue to be for young adults aged 25-34 with increasing number of placements also being commissioned in the 19-24 age range and above 34 years of age. We will need a flexible responsive cost-effective day opportunity market going forward to be able to respond to this need. Due to the increased unit costs and the Wellington house is no longer a viable option.

Provider engagement and market capacity

- The Council continues to monitor current and future demand as part of its wider commissioning and market development responsibilities.
- As part of the review process, Commissioners have engaged with Day opportunity providers currently operating within the city. Discussions have focused on current occupancy levels, capacity, capability, and the potential to expand provision should additional demand arise. Providers have advised that services generally operate at or close to capacity and typically expand provision in response to increased demand rather than maintaining vacant capacity.
- Further Market engagement has confirmed sufficient capacity to meet these individuals' assessed needs, through current capacity for 16 individuals and creation of additional capacity for 2 individuals with an existing provider newly commissioned to support specialist high care needs for people in the city. This work forms part of the council's wider commissioning and market sufficiency responsibilities. 2 individuals will no longer require building-based day opportunities due to a change in need and a further 1 Individual has expressed a preference to arrange support through a higher Direct Payment rather than attend a commissioned day opportunity service.

Consultation process

- Families, carers, and stakeholders were informed that savings are required across Adult Social Care services and that Wellington House was identified for review due to cost and falling demand considerations. Officers emphasised throughout the consultation that no final decision has been made and that all consultation responses, survey feedback, and stakeholder representations will be considered before Cabinet reaches a decision.
- Staff have had the opportunity to engage with Managers, Councillor Mitchie Alexander and have also been provided with opportunities to participate in the consultation process through online and paper-based feedback mechanisms.

- Should the Wellington House service be agreed to proceed to closure a Staff Consultation would inform next steps for staff members. SCDS staff and the Cherish manager would also require a Staff Consultation process.

Equality, Wellbeing and Human Rights Considerations

- The Council recognises that any significant service change may have implications for individuals attending Wellington House and their families and carers. A range of mitigation measures have therefore been identified to support potential impacts. These include person-centred transition planning, accessible communication, advocacy support, social work involvement and ongoing engagement with families and carers.
- Most people attending Wellington House are adults aged between their 40s and 60s. Any future provider would therefore be expected to demonstrate the skills and experience necessary to support adults with learning disabilities who may also be experiencing age-related health conditions, increasing frailty, or changing support needs.
- Alternative providers would be required to demonstrate their ability to support and meet needs relating to:
    - Learning disability
    - Autism
    - Communication needs
    - Sensory needs
    - Behavioural support needs
    - Physical disability, mobility, or sensory loss
    - Mental health and emotional wellbeing
    - Epilepsy and other health needs
    - Age-related or changing needs
    - Requirements arising from individuals' cultural, ethnic and faith/belief identities, including dietary needs
    - Sex, gender identity, gender reassignment, and sexual orientation
    - Menopause, perimenopause, and related support needs
    - Cumulative and intersectional needs
    - It will be ensured that expectations from the provider are reflected in people's care and support plans, service specifications, quality assurance arrangements, and contract monitoring.

These requirements would be reflected through contractual arrangements, service specifications, quality monitoring processes, and equality monitoring requirements.

Communication and Advocacy

- Following discussions with families, carers, social workers, clinicians and Speak Out Advocacy, a proportionate approach has been adopted regarding communication with individuals currently attending Wellington House. Concerns were raised that discussing proposals before any formal decision has been made could create significant anxiety and uncertainty, particularly for some autistic adults and people with limited capacity to understand the decision-making process.
- Should the proposal proceed, information would be provided in accessible and personalised formats, including Easy Read materials, visual communication tools, Makaton, and social stories where appropriate. Independent advocacy support would also be available to support individuals through any transition process.

Human Rights

- Any future service provision would be commissioned through the Council's approved provider arrangements and would be subject to quality assurance and contract monitoring processes. Care Act reviews, person-centred support planning and ongoing professional oversight would ensure that individuals' rights, wellbeing, and preferences remain central to decision-making and service delivery.

Conclusion.

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- Should the proposal be agreed to proceed, alternative provision will provide continuity of support and demonstrate the skills, experience and capacity required to meet the diverse needs of individuals currently attending Wellington House. Individualised transition plans would be implemented to minimise disruption and promote positive outcomes for individuals and their families. A six-week placement review would ensure that each person is provided with best support to enable a positive transition. This would be followed by an annual review. Carers assessments would be reviewed as part of the ongoing review process. Ongoing quality assurance and contract monitoring would provide assurance of good quality provision.
- The Council recognises that any significant service change will have implications for individuals attending Wellington House and their families and carers. A range of mitigation measures have therefore been identified to support potential impacts

  The council would ensure that the findings and Actions required within this Equalities Impact Assessment are adhered to with the intention of providing the required support throughout the transition process with a 6-week review and annual review of the new placement and updated Carers review during this process.

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

(State Yes, No, Not Applicable as appropriate)

Age	**YES**
Disability and inclusive adjustments, coverage under equality act and not	**YES**
Ethnicity, 'Race,' ethnic heritage (including Gypsy, Roma, Travellers)	**YES**
Religion, Belief, Spirituality, Faith, or Atheism	**NO**
Sex	**YES**
Gender (including non-binary and Intersex people)	**NO**
Gender Reassignment	**NO**
Sexual Orientation	**NO**
Marriage and Civil Partnership	**NO**
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	**NO**
Armed Forces Personnel, their families, and Veterans	**NO**
Expatriates, Migrants, Asylum Seekers, and Refugees	**NO**

Carers	**YES**
Looked after children, Care Leavers, Care and fostering experienced people	**Not applicable**
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	**Not applicable**
Socio-economic Disadvantage	**YES**
Homelessness and associated risk and vulnerability	**Not applicable**
Human Rights	**YES**
Transition planning: Young people transitioning to adult provision in the next two years	**YES**

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy, numeracy and /or digital barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

The internal Council social care case management recording system “Eclipse” includes areas to add information on pronouns, sexual orientation, religion, gender, sex at birth but this is not recorded for the individuals attending Wellington House. This would be captured within Care and support plans. Each person has received an updated social care assessment review to inform the consultation and give good up to date information on current needs as part of the process for proposed recommissioning.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

We are communicating with families and carers to ensure that the impact on individuals is discussed and best interest decisions are made where required in compliance with the Mental Capacity Act 2005, about how and when to inform people of different stages of the process which could cause increased anxiety, particularly for autistic individuals, at a stage where no final decision has been made and reassurance would be limited. It has been agreed that people will only be informed of the proposal if needed once a formal decision is reached. Information would then be shared in a way that is tailored to individual communication and support needs and at the right time for each person.

We understand that change may be difficult for families and carers of those supported at Wellington House. The service is highly valued by those who attend the service. Families' carers and staff are concerned about the potential impact of the proposal to close. They believe closure would have substantial negative impacts on wellbeing, stability, and inclusion for people with

learning disabilities and their families, while questioning whether alternative provision has sufficient capacity or specialist expertise to meet need. We will ensure that any proposed change is addressed in a way and at a pace that ensures best support to all those impacted. Social workers will support careful decision making and transitions and the needs of those supported and their families and carers will be addressed through the agreed outcomes of Care Act reviews for individuals and Carers.

We are working with Speak Out Advocacy service.

Mental capacity assessments and Best interests decisions will be made in line with the law and individual need.

Where indicated, Individual Advocacy referrals will be made. This needs to be at the right time, should the proposal be agreed to proceed. Currently it is not possible for Advocates to have the required discussions with individuals due to the risk of increased anxiety as raised above.

Families, carers, managers, and staff know individuals well and will ensure that people are supported in the best way for them. Close monitoring of communication and patterns in behaviour will support awareness of the impact of this activity on individuals. Where required people are supported by SCDS Clinicians Psychiatry and Psychology teams who have a good understanding of the individuals needs and can help to monitor and advise on any changes in presentation throughout the process and ongoing.

All Family carers have been offered a Carers assessment to discuss with a social worker their own current needs and the impact of their caring role. These discussions also considered any impact that a change in Day provision may have and how best to mitigate the potential impacts. Families and carers have good contact with managers of the service and SCDS and will be able to inform and request support should there may be impacts at home.

If the proposal proceeds, impact will be monitored before, during and after transition to ensure that people are safe, settled and receiving provision that meets their assessed needs. Monitoring should include feedback from the person, their family carers, circles of support, advocates where involved, social workers, providers and relevant health professionals and ensure required adjustments to the persons Care and support plan and risk assessments.

To ensure people are safe, settled and receiving equivalent, suitable support after any move, a social worker to ensure 6-week placement review and annual review.

Earlier review should take place if concerns are raised. Where the new provision may not be meeting the person's needs, this will include urgent review of the Care and support plan and risk assessment, provider adjustments, additional support or alternative provision.

New provider to monitor attendance, wellbeing, behaviour, engagement, incidents, safeguarding concerns, complaints, carer stress, and social connection. To ensure that social work team are kept updated of any concerns. Commissioning contracts team to review provider performance through contract monitoring and equality monitoring. Reporting themes and emerging issues to the relevant governance group and where concerns are identified, remedial actions will be agreed recorded and reviewed.

6. Impacts

Advisory Note:

- **Impact:**
  - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination) and then assessing the relevance (that is: the

potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
    - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean**: Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
    - In each protected characteristic or group, in answer to the question 'If "YES," what are the positive and negative disproportionate impacts?' describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
    - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for Health inequalities, review guidance and inter-related impacts, and the impact of various identities.
    - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
    - **Consider a wide range (including but not limited to):**
        - Population and population groups
            - Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council
        - Census and local intelligence data
        - Service specific data
        - Community consultations
        - Insights from customer feedback including complaints and survey results
        - Lived experiences and qualitative data
        - Joint Strategic Needs Assessment (JSNA) data
        - Health Inequalities data
        - Good practice research
        - National data and reports relevant to the service
        - Workforce, leaver, and recruitment data, surveys, insights
        - Feedback from internal 'staff as residents' consultations
        - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
        - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the Equality Act 2010 and about our Public Sector Equality Duty.

Wellington House currently supports a relatively small number of people (21 people attending the service and 3 people accessing drop-in support). Due to the size of the group and the need to avoid identifying individuals, detailed equality monitoring information is not presented for all protected characteristics.

As information about some protected characteristics, including religion or belief, sexual orientation, gender identity, gender reassignment and marriage and civil partnership, is not routinely collected. This assessment therefore draws on Care Act reviews, consultation responses, advocacy feedback, professional knowledge of individuals, service records and engagement with families, carers, staff, providers and stakeholders

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: older people, people who may be housebound, those under 16, young adults, with other intersections.	YES

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

15 people currently attending Wellington House are adults with learning disabilities in their 40s, 50s and 60s with the largest proportion of people in their 40s and 50s, many of whom have attended the service for a long time and have developed long-standing relationships their peers and support staff.

Some conclusions regarding the age profile of Wellington House Service Users can be drawn in terms of the in-house provision having been in existence for a long time and fewer new placements in recent years. This means there will be fewer young people in the service. The lower numbers of individuals at the higher age could be attributed to the lower mortality rate for adults with learning disabilities across the general population and/or increasing health and mobility needs of individuals results in them having to be supported in a more specialist service. Feedback from consultation and engagement with families, carers, stakeholders and advocacy organisations consistently highlighted concerns about the impact of major change on people who have attended the service for many years. Respondents described Wellington House as a stable environment which supports routine, predictability, friendships and social connection. Families expressed concern that older adults may find change particularly distressing and may experience increased anxiety, reduced wellbeing and loss of confidence if required to move to unfamiliar provision.

As 15 people currently using Wellington House are in mid to later adulthood (40+ years) and some may also be experiencing age-related health conditions, which may change their support needs alongside learning disabilities and autism. This means they may experience a disproportionate impact from changes to long standing support arrangements. Consultation responses suggested that disruption to established routines and relationships could affect people's emotional wellbeing, behaviour, participation and ability to engage in activities.

The review of younger people transitioning into adulthood identified a projected reduction in demand for day opportunities. Only two people within this cohort will require Day opportunities and their needs can be met in community-based provision for younger adults.

To mitigate potential impacts, all individuals have received Care Act reviews, and any transition planning would include consideration of age-related needs (including perimenopause and menopause), health requirements, routines, communication needs, personal outcomes and friendship groups. Alternative providers would be required to demonstrate their ability to support adults with learning disabilities who may also be experiencing age-related health conditions, frailty or changing support requirements.

Each person will have an individual transition plan agreed with people supported (where they may have capacity to be involved), their families, carers and circles of support, which aim to minimise disruption to their wellbeing, routines, relationships and family life as much as possible.

The plans will consider people's routines, support and communication needs, known triggers, preferred activities, friendships and support strategies, impact of any move to an alternative provider on family and carer routines, transport arrangements, work or caring responsibilities and the practical support needed throughout the transition process.

Where appropriate, familiarisation visits, phased introductions and involvement from current staff, families, carers and advocates will be used to reduce disruption.

Friendships, routines and social connection of people supported will be protected as much as possible,

Post-transition monitoring 6-week placement review would seek to identify any deterioration in wellbeing or increased support needs at an early stage. An annual review will also be arranged.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	YES

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

All individuals currently attending Wellington House have a learning disability.

The service currently supports people who are autistic, have communication needs, sensory processing differences, behavioural support needs, emotional wellbeing needs, mental health needs, epilepsy and sight loss.

Of the 21 people who attend Wellington House around 8 people have complex needs, the other people who attend have moderate needs. 4 additional people also attend drop ins at Wellington house supported by staff from home.

As all individuals currently attending Wellington House have a learning disability, the proposed closure has the potential to impact all current Service Users through changes to established routines, relationships, support arrangements and service environments, with people with most complex needs being disproportionately affected, also in terms of finding a suitable, tailored alternative provision.

The consultation evidence also suggests that some groups of disabled people may experience a greater level of impact than others. In particular, people with the highest support needs, autistic people, people with complex communication needs, people with sensory processing differences, people who require positive behavioural support and people whose wellbeing is closely linked to predictable routines and trusted relationships may be disproportionately affected by Wellington House closure and transition process.
For these groups, identifying and implementing suitable alternative provision may be more complex and may require highly individualised planning. If transitions are not carefully managed, there is an increased risk of anxiety, distress, dysregulation, reduced participation, social isolation, deterioration in wellbeing, or an increase in assessed support needs.
Consultation responses also highlighted that people with limited verbal communication or reduced ability to self-advocate may experience additional barriers in expressing their views, understanding changes and influencing decisions about future support arrangements. This may increase the risk that their preferences and needs are not fully reflected unless appropriate advocacy, communication support and person-centred planning are provided.

Throughout the consultation process families, carers, staff, advocacy organisations and stakeholders consistently described Wellington House as a safe, specialist and highly valued service. Respondents highlighted the importance of specialist staff knowledge, autism-informed practice, positive behavioural support, communication support, sensory-friendly environments, quiet spaces and established relationships.

Concerns were repeatedly raised that alternative providers may not be able to replicate the specialist support currently provided.
Families described their fears that disruption to established routines, relationships and support arrangements can lead to deterioration of wellbeing of Service Users, their increased anxiety, distress or even self-injurious behaviour, aggression, poor sleep, if familiar staff, routines and environments are lost.

Advocacy feedback demonstrated that people attending Wellington House place significant importance on friendships, feeling happy, having trusted relationships with staff, and taking part in meaningful activities. Consultation responses also highlighted that individuals who have limited verbal communication, may find it difficult to self-advocate or may lack capacity to understand complex organisational changes.

Several responses expressed concern that disruption could disproportionately affect autistic people, people with sensory sensitivities, people with communication needs and people who rely heavily on structure and predictability.

A range of mitigations have been identified.

- All individuals have received updated Care Act reviews. Any transition would involve detailed person-centred planning with families, carers, advocates, social workers, clinicians and providers.
- Mental Capacity Act assessments and best-interest processes would be undertaken where required. Independent advocacy would be available.
- Alternative providers would be required to demonstrate their ability to meet needs relating to learning disability, autism, communication needs, sensory needs, behavioural support needs, physical disability, mobility needs, sensory loss, mental health and emotional wellbeing, epilepsy and other health needs, age-related or changing needs, requirements arising from individuals' cultural, ethnic and faith or belief identities (including dietary needs), sex, gender identity, gender reassignment, sexual orientation, menopause and perimenopause, and cumulative or intersectional needs.
- Social workers will ensure that expectations from the provider are reflected in people's care and support plans and risk assessments. Service specifications, quality assurance arrangements, and contract monitoring will provide assurance of the quality of the day provision.
- No proposed placement will be made until a best interest decision has been made (where applicable) that includes the provider, the person's family /carer or where appropriate and other relevant professionals before any individual transition begins.
- All communications and information will be provided in accessible formats and through individuals preferred accessible communication methods, including Easy Read, visual information, Makaton, objects of reference and social stories would be used where appropriate.
- All communications, information and meetings with families and carers will also be accessible, including, but not limited to, an option of telephone, letter and e-mail communications in variety of accessible formats and face-to-face meetings to fit around family life and caring/work responsibilities. Families will have an opportunity to

communicate their inclusive requirements and any support required to be able to fully participate in the process, including support due to digital exclusion.

- Transition planning meetings will be arranged at suitable accessible locations, and visits to any proposed new service will be organised by a social worker in partnership with the person, their family and carers, with inclusive adjustments provided where required.
- Each person will have an individual transition plan agreed with people supported (where they may have capacity to be involved), their families, carers and circles of support, which aim to minimise disruption to their wellbeing, routines, relationships and family life as much as possible. The plans will include consideration of the impact of any move to an alternative provider on family and carer routines, transport arrangements, work or caring responsibilities and the practical support needed throughout the transition process.
- Transition will include familiarisation visits and phased introductions.
- Individual Advocacy is available for 1:1 support where it is indicated.
- Personalised support is available for each individual from highly experienced staff supported by the SCDS social work team and Learning disability specific clinicians Psychiatry and Psychology where this is needed.
- Significant friendships and long-term relationships which developed over many years, preferred peer groups, and social connections as gathered through Care Act reviews and staff knowledge, are mapped to maintain peoples' social networks and sense of belonging as much as possible.
- Friendships and relationships were captured within individual reviews and commissioners and social work managers are aware of the groupings that would like to stay together with any new proposed reprovision.
- Providers will be required to show how they will support social inclusion, meaningful relationships, and community participation and to ensure new weekly activity plans continue to reflect the person's interests, preferred routines, and social needs.
- People at higher risk of isolation or distress if separated from known peers are identified.
- Ensure that families and unpaid carers are supported before, during and after transition, to reduce the risk of carer stress, family disruption and breakdown of existing caring arrangements.
- Carers' assessments/reviews to be revisited by a social worker during transition, at 6-week placement review and annual review
- Post-transition monitoring would include review of wellbeing, attendance, safeguarding concerns, engagement, behaviour, maintaining friendships, social participation and family feedback.

What inclusive adjustments are you making for diverse disabled people impacted? For example: those who are housebound due to disability or disabling circumstances, D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

- Whilst the needs of the individuals attending these services vary, it has been agreed with Families and carers, Social workers, Professionals and Speak Out Advocacy service that informing service users of the proposal whilst a decision has not been made is not in their interest, due to limited capacity to understand the concept, which could cause increased anxiety, particularly for autistic individuals, at a stage where no final decision has been made. At this stage options for reassurance would be limited whilst the timescale is long, a Council decision has not been made and therefore no concrete alternative is in place for individuals.

- We are working with Speak Out Advocacy service who have spent time with people who attend Wellington House Day Options and sensitively asked questions about what is important to them and their friendship groups. Following this, Speak Out have written a report on their perspective of the service provision and what is important to those who attend and advised on the best approach to engage with service users on the proposed closure of Wellington House. This is in line with the decision agreed with Parents and Carers, social workers, and professionals about the best interest approach.

- Individual Advocacy is available for 1:1 support where it is indicated.

- Personalised support is available for each individual from highly experienced staff supported by the SCDS social work team and Learning disability specific clinicians Psychiatry and Psychology where this is needed.

- Any transition to a new service provision will be carefully managed through a transition agreed with families and professionals.

- Communication will be tailored in an accessible format to individual needs and complies with the principles of the Mental Capacity Act, including Easy Read documents, pictures, objects of reference and Makaton to maximise individuals understanding.

- Social stories will support a carefully tailored transition to include getting to know new staff within the current environment before spending time in the new environment with current Day Options staff and a phased progression to the new environment and staff.

- Where indicated, individual advocacy referrals will be made. This needs to be at the right time, should the proposal be agreed to proceed. This process will involve: An assessment of capacity, an assessment on the impact on individuals' wellbeing and best interest.

- All individuals have received a Care Act review carried out by the Specialist Community Disability Service to ensure their care and support needs are up to date.

- We have ensured that Families and Carers who may not wish to provide an online survey response have been supported to access paper formats of the survey, and this has been fed into the data set by the BHCC communications team.

- All communications and information about proposed changes and transition will be provided in accessible formats and through individuals preferred accessible communication methods, including Easy Read, visual information, Makaton, objects of reference and social stories would be used where appropriate.

- All communications, information and meetings with families and carers will also be accessible, including, but not limited to, an option of telephone, letter and e-mail communications in variety of accessible formats and face-to-face meetings to fit around family life and caring/work responsibilities. Families will have an opportunity to communicate their inclusive requirements and any support required to be able to fully participate in the process, including support due to digital exclusion.

- Transition planning meetings will be arranged at suitable accessible locations, and visits to any proposed new service will be organised by a social worker in partnership with the person, their family and carers, with inclusive adjustments provided where required.

6.3 Ethnicity, 'Race,' ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	YES

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Most individuals affected are White British.
This indicates a disproportionate impact upon those who are White British/White origin
This data is not broken down as the number of individuals involved is so small this could render them identifiable.

There was limited consultation feedback specifically relating to ethnicity. One stakeholder theme highlighted the importance of cultural sensitivity, accessibility and communication that recognises individual needs.

Mitigations relating to this are:

- Whilst most individuals are White British, the successful provider will need to evidence how they will provide culturally sensitive support to people from different ethnic backgrounds, including those from Black and Racially Minoritised background, to ensure that needs arising from individuals' cultural, ethnic and faith/belief identities, including dietary needs, are met.
- Requirements around this will be included in the process of recommissioning for alternative services.
- We ensure that we support those for whom English is a second language. Managers will offer translation services. Currently this is not required by families and carers of people who attend the service. However, Easy Read, pictorials and social stories are offered to service users who do not speak English as their first language.
- Completion of key performance indicators and equalities monitoring data will be a requirement of the contract to be completed by the successful provider.
- All individuals have received a Care Act review carried out by the Specialist Community Disability Service to ensure their care and support needs arising from individuals' cultural, ethnic and faith/belief identities, including dietary needs, are up to date.

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	NO

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

This information is not recorded on the case management system Eclipse consistently and, due to the small number of people affected, no further analysis is available.

Families, carers, managers, and staff know individuals well and ensure that all people's needs arising from their faith, belief or cultural identities, including dietary needs, are identified through assessment, care planning or transition planning. Any future provider would be required to demonstrate how it will meet needs arising from individuals' faith, belief or cultural identities, including dietary needs to ensure that those needs are met. No consultation feedback was received specifically relating to religion, belief, spirituality, faith or atheism.

6.5 Sex:

Does your analysis indicate a disproportionate impact relating to Sex	NO

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The proportion of males to females are broadly similar and so both are affected equally across both services. This risk is mitigated by the Provider having to ensure they provide support that meets the needs of both male and female individuals. Alternative providers would be required to demonstrate their ability to meet needs relating to people's sex, including age-related or changing needs (such as for example menopause and perimenopause support). It is recognised that some of the individuals using this service may have developed important relationships with peers, and this information has been included in the Care Act reviews to ensure proper consideration is made as to how these relationships can be sustained if future contact is affected by these changes. Significant friendships and long-term relationships which developed over many years, preferred peer groups, and social connections as gathered through Care Act reviews and staff knowledge, are mapped to maintain peoples' social networks and sense of belonging as much as possible. Friendships and relationships were captured within individual reviews and commissioners and social work managers are aware of the groupings that would like to stay together with any new proposed reprovision. Providers will be required to show how they will support social inclusion, meaningful relationships, and community participation and to ensure new weekly activity plans continue to reflect the person's interests, preferred routines, and social needs.

6.6 Gender and Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Identity **(including non-binary and intersex people)?**	NO

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	NO

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

This information is not recorded on the case management system Eclipse or by the service themselves.

Care and support plans would identify Gender and Gender Reassignment needs to ensure support. SCDS Clinicians would be able to offer training to staff, support for the individual and understanding of the individual needs.

There is no information from the current service to indicate this is an area that will affect the individuals supported disproportionally, in either positive or negative way.

There is, however, a correlation between Autistic adults identifying as Trans. A significant proportion of the individuals affected are Autistic, this could mean some individuals may not identify with the gender they were assigned at birth but may be unable to communicate this due to their mental capacity and communication needs. Therefore, this information is not yet known.

No consultation feedback was received specifically relating to gender identity and gender reassignment.

The new provider will need to be able to be sensitive to this and would be required to demonstrate their ability to meet needs relating to individuals' gender identity or gender reassignment. This will be outlined in the Care and support plans and the service specification.

The service specification for our approved providers includes a requirement to train staff in LGBTQ+ awareness.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	NO

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

This information is not recorded on the case management system Eclipse.

Where this is known the information would be captured within Care and support plans to ensure relevant support and understanding of need.

There is no information from the current service to indicate this is an area that will affect the individuals supported disproportionally, in either positive or negative way.

As identified above, however, a higher proportion of autistic adults do not identify as heterosexual.

No consultation feedback was received specifically relating to gender identity and gender reassignment.

The new provider will need to be able to be sensitive to this and would be required to demonstrate their ability to meet needs relating to individuals' sexual orientation. This will be outlined in care and support plans and the service specification. The service specification for our approved providers includes a requirement to train staff in LGBTQ+ awareness.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

This is not recorded on Eclipse or by the service themselves. None of the individuals supported are married or in a civil partnership.

6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	YES

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No data is recorded on maternity, paternity, adoption, infertility on the case management system or by the service themselves. There is no information from the current service to indicate these areas affect the individuals supported and as such would not have a disproportionate impact, either positive or negative. The data shows that there are a similar proportion of female to male Service Users, with several women of menopause or peri-menopause age range who may therefore be disproportionality impacted. There is also a correlation between autism and premenstrual dysphoric disorder (PMDD). To mitigate this, alternative providers would be required to demonstrate their ability to meet people's needs relating to menopause and perimenopause support, including needs specific to autistic adults. This will be outlined in Care and support plans and the service specification.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	NO

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The successful provider will need to evidence how they will provide culturally sensitive support to people to ensure that needs arising from individuals' cultural, ethnic and faith/belief identities, including dietary needs, are met. Requirements around this will be included in the process of recommissioning for alternative services. We ensure that we support those for whom English is a second language. Managers will offer translation services. Currently to our knowledge, this is not required by families and carers of people who attend the service. However, Easy Read, pictorials and social stories are offered to service users who do not speak English as their first language. Completion of key performance indicators and equalities monitoring data will be a requirement of the contract to be completed by the successful provider. All individuals have received a Care Act review carried out by the Specialist Community Disability Service to ensure their care and support needs arising from individuals' cultural, ethnic and faith/belief identities, including dietary needs, are up to date.

6.12 Carers:

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	YES

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Wellington House Day Options provide activities for the individuals with learning disabilities, some who are autistic, and valuable respite for family carers. There are a small, but significant number of family carers who could be impacted by this change. It is important that these caring arrangements are not destabilised by this change, The feedback from consultation and engagement showed that the Wellington House closure has a potential to disproportionately affect carers through increased caring demands, emotional

strain and practical pressures if alternative provision does not meet Service Users' assessed needs or if they experience distress during transition. The impact may be greater for older carers, lone parents, carers supporting multiple relatives and carers experiencing their own health challenges.

Survey responses described Wellington House as providing essential respite for carers, enabling them to attend appointments, run errands, spend time with family and friends, and in some cases work or consider returning to work. Consultation feedback also indicated that some carers have wider caring responsibilities, including caring for older relatives or other disabled family members.

Carers consistently described Wellington House as an essential source of respite and reassurance. Families reported confidence that their relatives are safe, supported and engaged while attending the service. Survey responses identified carers' concerns regarding loss of routine, anxiety and distress for the person cared for, suitability of alternative provision, staff skills, friendship groups, transport arrangements, impact on employment and loss of respite opportunities. Carers expressed concern that changes could lead to increased caring responsibilities, deterioration in their own wellbeing, family stress, sleep disruption and risks to the sustainability of caring arrangements.

We understand that change may be difficult. The service is highly valued by those who attend the service. Feedback demonstrated that families' carers and staff are concerned about the potential impact of the proposal to close. They believe closure would have substantial negative impacts on wellbeing, stability, and inclusion for people with learning disabilities and their families, while questioning whether alternative provision has sufficient capacity or specialist expertise to meet need.

A potential positive impact of day options provider change is that alternative day activity provision may be closer to the family home and thereby reduce travel time for the individual. Travel arrangements will be discussed at the time of placement.

Mitigations include offering carers' assessments or reviews, involving carers in transition planning, providing regular communication and named points of contact, ensuring carers can participate in provider matching discussions, offering advocacy where required and providing escalation routes if concerns emerge. Social workers will review the impact on caring arrangements and consider the support needed to maintain carer wellbeing and prevent breakdown of existing care arrangements.

Other mitigations:

- As part of the Care Act review of the individual's needs, family carers have been offered a Carers Assessment to ensure that carers will be appropriately supported.
- We will ensure that any proposed change is addressed in a way and at a pace that ensures best support to all those impacted. Social workers will support careful decision making and transitions and the needs of those supported and their families and carers will be addressed through the agreed outcomes of Care Act reviews for individuals and carers.
- Any transition would involve detailed person-centred planning with families, carers, as well as advocates, social workers, clinicians and providers. Each person will have an individual transition plan agreed with people supported (where they may have capacity to be involved), their families, carers and circles of support, which aim to minimise disruption to their wellbeing, routines, relationships and family life as much as possible. The plans will include consideration of the impact of any move to an alternative provider on family

and carer routines, transport arrangements, work or caring responsibilities and the practical support needed throughout the transition process.

- All communications, information and meetings with families and carers will also be accessible, including, but not limited to, an option of telephone, letter and e-mail communications in variety of accessible formats and face-to-face meetings to fit around family life and caring/work responsibilities. Families will have an opportunity to communicate their inclusive requirements and any support required to be able to fully participate in the process, including support due to digital exclusion.
- Transition planning meetings will be arranged at suitable accessible locations, and visits to any proposed new service will be organised by a social worker in partnership with the person, their family and carers, with inclusive adjustments provided where required.
- Significant friendships and long-term relationships which developed over many years, preferred peer groups, and social connections as gathered through Care Act reviews and staff knowledge, are mapped to maintain peoples' social networks and sense of belonging as much as possible to minimise the risk of distress and disruption to family life.
- We will ensure that families and unpaid carers are supported before, during and after transition, to reduce the risk of carer stress, family disruption and breakdown of existing caring arrangements.
- All carers to be offered an assessment or review and impact on carers to be recorded in transition planning. Carers' assessments/reviews to be revisited by a social worker during transition and within 6-week placement review and annual review.
- Post-transition monitoring would include review of wellbeing, attendance, safeguarding concerns, engagement, behaviour, maintaining friendships, social participation and family feedback.

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). **Also consider our Corporate Parenting Responsibility in connection to your activity.**	NO

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)	NO

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	NO

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	YES

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

All the individuals attending this service by nature of the level of their learning disability are in receipt of disability benefits. There should be no change to their level of Service Users' income because of any Day opportunity reprovision. Consultation feedback indicated that the proposal may have indirect socio-economic impacts for some families and carers. Respondents highlighted concerns about the impact on their ability to work or manage other caring responsibilities (for example caring for their parents or disabled family members), travel and transport difficulties and concerns about costs. Families described Wellington House as providing essential respite which enables them to attend appointments, undertake caring responsibilities and, in some cases, remain in or consider returning to work. Although no direct impact on Service Users' income or benefits or transport costs has been identified, the consultation evidence suggests that changes to day provision could have indirect socio-economic impacts for some carers and families. Any travel arrangements and transport cost agreements currently in place will continue, to ensure travel needs are met within new provision. Alternatives to the current travel plans will be agreed with people supported and their families where required. Mitigations include offering carers' assessments or reviews, involving carers in transition planning, providing regular communication and named points of contact, ensuring carers can

participate in provider matching discussions, offering advocacy where required and providing escalation routes if concerns emerge. Social workers will review the impact on caring arrangements and consider the support needed to maintain carer wellbeing and prevent breakdown of existing care arrangements.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	YES

If "YES," what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

As the proposal is aiming to achieve a seamless transition to a new provider with minimal impact to the individuals supported and their families and carers, it is not anticipated that the proposed change will have a disproportionate impact, either positive or negative, in this area.

As with all change of service, there are risks associated with this that could affect individuals' human rights. The mitigations around this are:

- Alternative provision will be procured through the council's framework of approved providers to ensure that any new provision complies with the council's quality framework.
- All individuals have a service Care and support plan that outlines data in this area relating to individual's needs.
- All individuals have had a Care Act review carried out by the Specialist Community Disability Service to ensure their care and support needs are up to date. A six-week placement review will be in place along with an annual review of placement and need.

6.18 Cumulative, multiple intersectional, and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
    - People being housebound due to disabilities or disabling circumstances
    - Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
    - People experiencing homelessness
    - People on a low income and people living in the most deprived areas
    - People facing literacy, numeracy, and/or digital barriers
    - Lone parents
    - People with experience of or living with addiction and/ or a substance use disorder (SUD)
    - Sex workers
    - Ex-offenders and people with unrelated convictions
    - People who have experienced female genital mutilation (FGM)

- People who have experienced human trafficking or modern slavery

The proposed closure and re-provision of Wellington House Day Options have a potential to create cumulative and intersectional impacts for people who experience multiple forms of disadvantage or additional support needs.
All people currently attending Wellington House have a learning disability and some individuals are also autistic, have communication needs, sensory differences, mental health needs, complex health needs, epilepsy or are physically disabled.
The consultation consistently highlighted concerns about the impact of changes to familiar staff, routines, environments and relationships. For people experiencing several of support and communication needs and for those who are members of multiple minoritised groups, the impact of change may be greater.
Feedback from families, carers, advocates and stakeholders identified concerns about anxiety, distress, disruption to routines, loss of social connections and difficulties adjusting to unfamiliar environments, particularly for autistic people and those with communication, sensory or behavioural support needs.

Cumulative impacts may also affect family carers. Consultation responses highlighted that some carers rely on Wellington House to provide respite, to enable them to manage other caring responsibilities, attend appointments or maintain employment. As a result, any difficulties experienced during transition could have a wider impact on family wellbeing, caring arrangements, mental health and the ability to sustain caring responsibilities.
Mitigations include person-centred Care Act reviews, provider matching processes, individual transition plans, accessible communication, advocacy support, consideration of friendship groups and social connections, carers' assessments, family involvement in planning, post-transition monitoring and review, and requirements for providers to demonstrate their ability to meet a broad range of assessed needs, including those arising from multiple and intersecting characteristics.

7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

The actions below have been informed by the comprehensive consultation and engagement undertaken with people supported by Wellington House, families, carers, staff, providers, advocates and wider stakeholders, ensuring that the concerns, experiences and priorities shared through the process are reflected in the proposed mitigations.

SMART ACTION 1
Ensure that alternative day services providers can evidence that they can meet assessed needs of each person who currently receives Day Options support at Wellington House.
The purpose is to ensure that no person moves to alternative provision unless the council is satisfied that the provider can meet their assessed needs, including requirements arising from individuals' cultural, ethnic and faith identities and their protected characteristics.

Activities:

- Require providers to complete an individual matching and compatibility assessment for each proposed placement.
- Require providers to evidence how they will meet needs relating to:
    - Learning disability
    - Autism
    - Communication needs
    - Sensory needs
    - Behavioural support needs
    - Physical disability, mobility, or sensory loss
    - Mental health and emotional wellbeing
    - Epilepsy and other health needs
    - Age-related or changing needs
    - Requirements arising from individuals' cultural, ethnic and faith/belief identities, including dietary needs
    - Sex, gender identity, gender reassignment, and sexual orientation
    - Menopause, perimenopause, and related support needs
    - Cumulative and intersectional needs
- Ensure that expectations from the provider are reflected in people's care and support plans, service specifications, quality assurance arrangements, and contract monitoring.

No proposed placement will be made until a placement has been offered that can evidence that it can meet the needs of the individual. Best interest decisions that include the provider, the person's family/carer and, where appropriate, other relevant professionals, will support this process, led by a placing social worker before any individual transition begins.

The requirement of any new provider to meet these areas is a condition of the Approved Provider framework, key performance indicators, and equalities monitoring (as appropriate).

It will be ensured that expectations from the provider are reflected in people's care and support plans, service specifications, quality assurance arrangements, and contract monitoring.

Ongoing quality monitoring will be undertaken through contract reviews.

Success measure: All 21 people have an agreed provider matching assessment and updated support plan before moving.

All 4 people currently using the Wellington House service as a drop in option with their own staff will be supported to find an alternative activity/building base.
All communications and information will be provided in accessible formats and through individual's preferred accessible communication methods, including Easy Read, visual information, Makaton, objects of reference and social stories would be used where appropriate. All communications, information and meetings with families and carers will also be accessible, including, but not limited to, an option of telephone, letter and e-mail communications in variety of accessible formats and face-to-face meetings to fit around family life and caring/work responsibilities. Families will have an opportunity to communicate their inclusive requirements and any support required to be able to fully participate in the process, including support due to digital exclusion.

SMART ACTION 2

Each person will have an individual transition plan agreed with people supported (where they may have capacity to be involved), their families, carers and circles of support, which aim to minimise disruption to their wellbeing, routines, relationships and family life as much as possible. The plans will include consideration of the impact of any move to an alternative provider on

family and carer routines, transport arrangements, work or caring responsibilities and the practical support needed throughout the transition process.
Transition planning meetings will be arranged at suitable accessible locations, and visits to any proposed new service will be organised by a social worker in partnership with the person, their family and carers, with inclusive adjustments provided where required.
Transition planning meetings will be organised within Wellington House.

Purpose: To minimise disruption, anxiety, and distress, and ensure each person is supported to move in a way that meets their needs, including communication and emotional support needs.

Activities:

- Any travel arrangements in place now will continue to ensure travel needs are met within new provision. Alternatives to the current travel plans will be agreed with people supported and their families where required.
- Transition planning will be person-centred and informed by each individual's communication needs, sensory needs, health needs, routines, preferred activities, transport arrangements, staffing requirements, known triggers and any other factors that are important to their wellbeing and successful transition.
- Information, communication and transition support will be provided in accessible and personalised formats, including Easy Read, visual materials, objects of reference, Makaton, social stories and other communication tools or reasonable adjustments identified through the person's Care Act review and transition plan.
- Arrange familiarisation visits and phased introductions.
- New staff will be supported to get to know and observe the person within the familiar environment with known staff support.
- Familiarisation will progress to visits to the new provision with new staff and known staff from Wellington House or family member if this is agreed as the most supportive introduction to a new environment.
- Clear handover of Care and support plans/Risk assessment and Guidance's will be undertaken prior to the transition visits beginning.
- Each individual’s circle of support will monitor for any change or increase in need that may require input from behavioural support team, psychology, or clinicians to support transition.
- Transition planning will consider the impact of any move to alternative provision on the person’s established weekly routine, transport arrangements, family routines, unpaid caring arrangements, work commitments, and other responsibilities.

Measure: Every person has a completed transition plan, devised with their circle of support where appropriate, before any move takes place.

SMART ACTION 3

Protect friendships, routines and social connection of people supported as much as possible, recognising that Wellington House provides social belonging and peer relationships, not only structured activities.

Activities:

- Map significant friendships, long-term relationships which developed over many years, preferred peer groups, and social connections as gathered through Care Act reviews and staff knowledge, to maintain peoples’ social networks and sense of belonging as much as possible.
- Friendships and relationships were captured within individual reviews and commissioners and social work managers are aware of the groupings that would like to stay together with any new proposed reprovision.

- Consider whether people can move to alternative day service providers with friends or familiar peers where this is important to wellbeing.
- Require providers to show how they will support social inclusion, meaningful relationships, and community participation.
- Ensure new weekly activity plans continue to reflect the person's interests, preferred routines, and social needs.
- Identify people at higher risk of isolation or distress if separated from known peers.
- Monitor whether people are maintaining friendships and social participation after transition.
- Friendship and social connection mapping completed before placement matching; reviewed after transition by Allocated social workers, Commissioners and provider leads.

Success measure: Social connection needs are recorded in each person's transition plan and reviewed post-transition at 6 weekly placement review.

SMART ACTION 4

Support families and unpaid carers before, during and after transition

Purpose: To reduce the risk of carer stress, family disruption, and breakdown of existing caring arrangements.

Activities:

- Offer all family and unpaid carers a carers' assessment or review.
- Discuss the impact of any change in day provision on the carer's wellbeing, employment, other caring responsibilities, and ability to continue caring.
- Provide regular updates and a named contact for families and carers.
- Offer face-to-face meetings where requested.
- Ensure families and carers are involved in provider matching and transition planning where appropriate.
- Provide clear escalation routes if the person experiences distress, if the placement is not working, or if pressures at home increase.
- Carers' assessments/reviews revisited by a social worker during transition and at 6-week placement review.

Success measure: All carers have been offered an assessment or review, and carer impact is recorded in transition planning.

SMART ACTION 5

Social worker to ensure 6-week placement review to ensure that any transition issues are addressed.

Purpose: To ensure people are safe, settled and receiving equivalent, suitable support after any move.

Activities:

- Gather feedback from the person, family/carer, advocate, provider, social worker, and relevant clinicians.
- New provider to monitor attendance, wellbeing, behaviour, engagement, incidents, safeguarding concerns, complaints, carer stress, and social connection. To ensure that social work team are kept updated of any concerns.
- Commissioning team to review provider performance through contract monitoring and equality monitoring.
- Report themes and emerging issues to the relevant governance group.
- Families, carers, managers, and staff know individuals well and will ensure that people are supported in the best way for them. Close monitoring of communication and patterns in behaviour will support awareness of the impact of this activity on individuals.

• Where required people are supported by SCDS Social workers, Clinicians, Psychiatry and Psychology teams who have a good understanding of the individuals needs and can help to monitor and advise on any changes in presentation throughout the process Success measure: Reviews completed within 6 weeks and annually, with remedial action implemented and recorded where concerns are identified.
SMART ACTION 6 **Young people aged 16-17yrs transitioning to adult services.** The review of younger people transitioning into adulthood identified a projected reduction in demand for Day opportunities. These projections suggest that future demand for the current profile of Wellington House will continue to decline. Activities: • Commissioning team to continue to work closely with Children's services to identify the needs of young people coming through transitions. • Commissioning team to provide clearer information about transition forecasting, likely demand from young people leaving education, and how future need is being factored into day service planning. • Commissioning and Children's services to work closely with Integrated Care Board (ICB) to plan for required provision for young people with complex Health and mobility needs.

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

Some of the identified actions will inform the commissioning of individual Care Act reviews, and data collection gaps will be fed into service plans for action.

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	**X**

If your decision is to "Proceed with caution," please provide a reasoning for this:

The council recognises that the proposed closure and reprovision of Wellington House is likely to have a disproportionate impact on some of the people currently supported by the service, all of whom are adults with learning disabilities, particularly those with the most complex support needs, including autistic people, those with significant communication, sensory, behavioural, emotional wellbeing or health needs.

Consultation feedback highlighted the importance of established relationships, specialist support, predictable routines and a familiar environment, and identified potential risks including anxiety, distress, disruption to routine, reduced wellbeing and increased pressure on families and carers. However, having considered all available options, the proposal is being considered in the context of significant financial pressures, the need to ensure services remain sustainable and cost effective, reduced attendance, current and projected reductions in demand, and the requirement to deliver savings across Adult Social Care. The council would therefore proceed with caution, subject to robust mitigations including person-centred transition planning, provider assurance, protection of social relationships, carer support, contractual requirements relating to equality and inclusion, and ongoing quality and contract monitoring to ensure alternative provision is suitable, meets assessed needs and supports positive outcomes for those affected.

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

The proposal to close and re-provide Wellington House Day Options is being considered in the context of significant financial pressures within Adult Social Care and the council's need to ensure that services are sustainable, cost effective and able to meet current and future demand. Wellington House has been identified for review due to the current cost of delivery, reduced attendance, projected fall in demand over the next two years and the wider requirement to deliver savings across Adult Social Care.

Consultation feedback shows that Wellington House is highly valued as a familiar, trusted and specialist environment. People supported, families, carers, staff and stakeholders have highlighted the importance of skilled and consistent staff, established relationships, friendship groups, meaningful activities, predictable routines, safe spaces and the confidence families have that people are understood and well supported.
The Council recognises that the proposed closure has therefore a potential to cause anxiety, distress, disruption to routine, loss of familiar relationships, disruption to friendship groups and increased pressure on families and carers

Disproportionate impacts of the proposed closure have been identified, including significant impact on the people currently supported by Wellington House, all of whom are adults with learning disabilities, some of whom are also autistic and/or have complex communication, sensory, behavioural, emotional wellbeing or health needs, as well as on their families and unpaid carers, particularly where Wellington House provides an important source of routine, respite and stability.
Whilst all current Wellington House attendees are disabled people who will be affected by the proposed closure and reprovision, the impacts are likely to be experienced unevenly across the cohort. People with the most complex support needs, autistic people, those with significant communication or sensory needs, and those who depend on specialist staff knowledge, highly structured routines and bespoke support arrangements are likely to experience the greatest risk of disproportionate negative impact. These individuals may require more intensive assessment, planning and transition support to ensure suitable alternative provision is identified and that outcomes relating to wellbeing, inclusion, safety and participation are maintained.

Those impacts will be mitigated by robust provider assurance, person-centred transition planning, carer support, protection of social relationships and structured post-transition monitoring.
Having considered the impacts identified through this EIA and the consultation feedback received, the council would **proceed with caution** if a decision is made to close the Wellington House service, and only subject to robust mitigations and ongoing monitoring set out in this assessment, recognising significant impacts on the people currently supported within the Day Options service who are adults with learning disabilities, some of whom are also autistic and their family carers, as well as those who may have transitioned to Wellington House in the next two years.

These mitigations are intended to ensure that every person currently attending Wellington House receives alternative day opportunity support that is equivalent in quality and suitability, meets their assessed needs, and is planned in a person-centred way with the person, their family, carers, advocates and circles of support where appropriate.

Alternative providers would be required to demonstrate their ability to support and meet needs relating to:

- Learning disability
- Autism
- Communication needs
- Sensory needs
- Behavioural support needs
- Physical disability, mobility, or sensory loss
- Mental health and emotional wellbeing
- Epilepsy and other health needs
- Age-related or changing needs
- Requirements arising from individuals' cultural, ethnic and faith/belief identities, including dietary needs
- Sex, gender identity, gender reassignment, and sexual orientation
- Menopause, perimenopause, and related support needs
- Cumulative and intersectional needs
- Continue to uphold individuals' human rights
- Understand the potential cumulative, multiple intersectional, and complex impacts on the individuals that the change could affect as a disadvantaged minority group

The requirement of any new provider to meet these areas is a condition of the Approved Provider framework, key performance indicators, and equalities monitoring (as appropriate).
It will be ensured that expectations from the provider are reflected in people's care and support plans, service specifications, quality assurance arrangements, and contract monitoring.
Ongoing quality monitoring will be undertaken through contract reviews.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

10. Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Kim Foster	19-08-26
Accountable Manager:	Steve Hook	19-08-2026

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EDI Officer to cross-check against aims of the equality duty, public sector duty, and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Officer has considered the equalities impact to provide approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, Equalities inbox, any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing. Budget and Staffing EIAs secure approval via different templates.

Signatory:	**Name:**	**Date:** DD-MMM-YY
EDI Business Partner:	Zofia Danin	19-Aug-26
EDI Manager:		

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment:

BHCC Consultation Survey Wellington House.
PaCC response 06.07.2026
Survey response based on feedback collated from 30 parent carers, all of whom have children and young people with complex support needs. Feedback received in online and face-to-face meetings, phone calls, emails and parent carer WhatsApp groups.

Views on the proposal:

Overall, to what extent do you support or oppose the proposal?
Strongly oppose the proposal

Give reasons:
Parent carers strongly oppose the closure of Wellington House, citing a lack of evidence for safe alternatives and a failure to model future demand. Feedback from over 30 carers highlights critical risks to the city's most vulnerable residents.

1. **Failure in Long-Term Planning and Underestimated Demand**
   Carers challenge the "declining need" narrative and highlight a significant risk in the council's planning. This consultation focuses only on the 21 current service users, entirely failing to factor in future need. Parent carers are aware of a "growing demand" from young people transitioning from special schools who will require specialist, building-based care. The lack of data forecasting for those coming through the system suggests a lack of comprehensive long-term planning, leaving future school-leavers potentially without any suitable provision. Furthermore, PaCC flags that hard to reach families have not been included in this consultation due to time and capacity constraints.
2. **Gaps in Provision**
   Opposition remains rooted in a lack of confidence in council commissioning, and the need for a co-produced citywide vision. Carers point to ongoing gaps in provision; specialist social care support remains inequitable for the complex need's cohort eg: short breaks for CYP with complex needs after Extratime & Barnardos withdrew provision, training and opportunities for YP who do not meet Team Domenica thresholds. This history of "unstable external markets" leaves families fearful that users will be left with no support at all.
3. **Financial Volatiality and Rising Provider Costs**
   Carers argue that a £400k saving is unrealistic. Carers highlight that independent providers face massive inflationary pressures. There is a high risk that providers will increase prices as their own costs rise, quickly eroding savings. For the "complex needs" cohort, costs are volatile, and the council loses all bargaining power once internal provision is closed.

4. **Access to Fit for Purpose Buildings**
   To date providers are struggling to find venues that meet safeguarding and health needs of complex need children and young people. eg: Short Breaks 2026.
5. **National Workforce Crisis**
   The sector faces a dire recruitment crisis, with vacancy rates nearly three times the national average. Carers worry that relying on a private market plagued by high turnover will lead to unsafe care for individuals who require stable, trusted staff to manage non-verbal communication and complex medical needs.

What do you see as the potential risks or disadvantages of re-providing support through external provider services?
This response focuses on the direct impact on the safety and quality of life of the 21 individuals, and PaCC asks that Councillors ensure they pay strong attention to the needs of the wider community.

- **Clinical Safety Gaps:** Parent carers lack confidence in the evidence that independent providers possess the breadth of clinical skills required for this cohort. Families do not believe external services reliably offer the specialised health oversight needed for essential care, including tube feeding, clinical competence in physiotherapy and SALT, and medical management of complex epilepsy and behavioural needs. It is known that placements fail for these reasons.
- **Physical Space and Accessibility Constraints:** A critical risk is the lack of physical space and consistent wheelchair accessibility. Carers report that they have been told by alternative providers that they are at capacity and/or lack the "spare space," structural accessibility, or specific breakout spaces required for those needing behavioural support. This makes the promise of immediate re-provision unrealistic.
- **Invisible Demand and Ageing Carers:** The proposal fails to account for families currently supporting adults without formal services. As these carers age, they will require specialist, building-based support. Removing this safety net for "hidden" families will lead to future crises and emergency interventions.
- **Psychological Distress and Placement Failure:** Re-provision risks the destruction of friendship groups and trusted bonds. For non-verbal adults, these are vital for stability. When placements fail due to a provider's inability to meet needs, it leads to "parent carer burnout." Just one or two further emergency residential placements would completely wipe out any projected savings.
- **Aspiration, Quality and Safeguarding:** External provision often involves high staff turnover. Parent carers want reliable provision that the city can be proud of; they question why councillors are not committing this aspiration for such a vulnerable and marginalised cohort. Replacing a specialist environment with generic services increases the risk of neglect and long-term harm.

What risks or opportunities do you see in relation to market readiness and sustainability?
Based on feedback, the following risks to market readiness and sustainability have been identified, specifically regarding the council's capacity to manage this transition.

1. **Systemic Delays and Transition Planning**
   There is significant concern that overstretched social care teams are already struggling with timely transition planning for both current service users and young people entering the system. Evidence from parent carers indicates that annual assessments

remain significantly behind schedule. Relying on an independent market when the underlying social care infrastructure is already failing to meet statutory timelines creates a high risk of service gaps and safety failures.

2. **CQC Concerns and Lack of Transparency**
   The community is aware of the recent Adult CQC inspection, which specifically highlighted poor transitions as an area of concern. Parent carers report that the action plan following this inspection remains unknown to them. This lack of transparency, coupled with evidenced assessment delays, undermines any confidence that the council has the capacity to sustainably manage the complex reprovision of high-needs individuals.
3. **Financial Sustainability and "False Savings"**
   Carers argue the £400k saving risks being unrealistic. Independent providers face inflationary pressures and rising wage costs, which will be passed to the council. Furthermore, if placements fail due to a provider's inability to meet needs, "parent carer burnout" will likely lead to emergency residential care. Just one or two such placements would completely wipe out any projected savings.
4. **Failure of Direct Payments and Forecasting**
   Direct Payments are not a sustainable alternative due to the "recruitment scarcity" of PAs. Furthermore, the council's focus ignores the pipeline of young people in special schools and ageing carers in the community. Without factoring in this future demand, any market-shaping strategy is unsustainable and risks total system failure for the city's most vulnerable.

What impact do you think this proposal could have on people who currently use the service? (Select all that apply)
Other.

1. **Deterioration of Mental Health and Wellbeing**
   Carers describe Wellington House as a "community." The most significant impact is the psychological distress caused by the destruction of established friendship groups. For adults with complex learning disabilities—and for those who are non-verbal—these peer relationships are fundamental. Families fear removing these social anchors will lead to high levels of anxiety and a permanent decline in wellbeing, negatively impacting long term health outcomes.
2. **Physical Safety and Clinical Risks**
   Parent carers argue that re-provision risks the safety of those with profound medical needs. They highlight a lack of evidence that independent providers can replicate the necessary "clinical competence." Impacts may include risks to those requiring tube feeding, complex epilepsy management, and specialised nutritional support and behaviour management, alongside a move to providers lacking consistent wheelchair accessibility or breakout spaces.
3. **Regression in Skills and Communication**
   The proposal risks the loss of trusted relationships with experienced staff who uniquely understand each user's communication. Carers believe moving users to an external workforce hampered by the national recruitment crisis—characterised by high turnover—will lead to a regression in independence and a failure to meet basic care needs.
4. **Placement Failure and Family Breakdown**
   If a new placement cannot accommodate a user's high-support needs, it will likely fail. Such failures are catastrophic, often leading to "parent carer burnout" and a total

breakdown in the family's ability to cope. This forces the adult into emergency residential care.

5. **Marginalisation**
   Carers feel this cohort is being "left behind." They argue that closing the only specialist in-house provision deepens inequalities and reduces social inclusion for those with the highest support needs.

What would good support look like under the proposed new arrangements?

1. **Clinical, Specialist, and Behavioural Requirements**
   Any alternative offer must demonstrate the ability to meet complex health and behavioural requirements. This includes staff with assessed competence in tube feeding, SALT, physiotherapy, and medical management of epilepsy, alongside skilled implementation of Positive Behavioural Support (PBS). Facilities must be fully wheelchair accessible, featuring ceiling track hoists, sensory rooms, and dedicated breakout spaces. Provision must be more aspirational, focusing on improving life outcomes and independence for young people rather than merely meeting basic safety.
2. **Transparency and Quality Information**
   A major barrier is the distinct lack of information about independent providers. Carers report they do not have the details needed to make informed choices. Good support requires the council to provide clear, verified data on provider standards and clinical skill sets. Councillors should defer decision-making until they fully understand the actual capacity and competency within the independent sector to meet these specific needs.
3. **Delayed Engagement with Young Adults**
   Councillor Mitchie Alexander committed to engaging with parent carers of younger adults to feed into future provision. To date, this specific engagement has not taken place. PaCC highlights that this specific consultation should happen ahead of any final decision-making to ensure the needs of those transitioning into adult services are represented.
4. **Protecting Relationships and Friendships**
   Good support includes the preservation of "friendship groups." Social circles are vital for the mental health of non-verbal adults; any transition must move peer groups together. Support must be delivered by a stable, skilled workforce to ensure continuity.
5. **Statutory Compliance and Statutory Duties**
   Parent carers fear the quality of life for adults with learning disabilities is being dictated by budget deadlines rather than individual needs. Carers report that for some, a transition may take a year or much longer; for some families, no appropriate alternative provision is found. Moves should be individually planned, adequately resourced, and involve families as partners. No move should occur until new provision is proven to meet all assessed needs. The council must ensure provision for the eligible cohort complies with Equality Act and Equalities legislation duties. PaCC ask: are all voting councillors confident that sufficient appropriate provision is available and how will they evidence this to the community?

What should the council consider in promoting equality and inclusion?

1. **Marginalisation and Central Government Funding**
   Brighton & Hove cites its status as an inclusive city, yet carers argue adults with learning disabilities remain on the margins. They believe closing the only in-house primary specialist hub further pushes this cohort out of sight. Parent Carers do not see evidence of BHCC putting pressure on central government regarding the significant funding issues affecting social care provision and ask if this is happening where it is communicated.
2. **Cumulative Impact of Budget Cuts**
   Councillors must consider the significant cumulative impact of savings across all BHCC services and provisions. Carers argue the loss of Wellington House, alongside wider service reductions, creates a "piling on" effect that disproportionately undermines the quality of life for this specific marginalised group.
3. **Planning and the "Accessible City"**
   The council is proud of landmark developments like the seafronts and potential King Alfred development, but PaCC flags that the learning disability community is not sufficiently catered for in broader city planning. They ask do such projects consider this community within the Accessible City strategy, and how will this be evidenced.
4. **Market Fragility and Gaps in Provision**
   Carers point to provider withdrawals as evidence of market instability. They highlight ongoing gaps for CYP with high support needs within Short Breaks and wraparound care. The council must demonstrate how it will prevent a similar failure for adults, ensuring capacity shortages do not lead to total social isolation.
5. **Statutory Duties and Local Transparency**
   All decisions must comply with the Equality Act 2010. Carers highlight that current delays in assessments and the lack of transparency regarding the action plan following the recent Adult CQC inspection suggest the council is currently falling short of its statutory duties.

Is there anything else you would like the council to consider before decision is made?
"Invest to Save": Proposals to Enhance Wellington House
Parent carers believe expanding the building's facilities will address critical gaps in provision while protecting the long-term budget.

1. **Mitigating High-Cost Crisis Placements**
   Proposal: Reposition Wellington House as a specialist "Centre of Excellence" for those with complex medical and behavioural needs.
   Saving: Providing local, high-intensity support that independent providers cannot accommodate avoids exorbitant out-of-city residential costs. This proactively manages the most expensive end of the care market.
2. **Enhancing Respite and Family Resilience**
   Proposal: Use the site to complement Beach House, especially where Beach House cannot meet needs. As well as daytime provision provide early evening and weekend respite opportunities, and space for Short Breaks providers who struggle to find accessible venues.
   Saving: Reliable respite prevents parent carer burnout. Supporting families for longer prevents breakdowns; just one or two failed placements necessitating emergency residential care would instantly negate any projected savings from closure.

3. **Specialist Transition Hub**
   Proposal: Manage the "pipeline" of young people (18–25) leaving special schools.
   Saving: Transitions for this cohort can take a year or much longer. Using the site as a bridge ensures stability and prevents the costly "churn" and crisis costs of placement failures in the independent sector.
4. **Hybrid Partnerships, Joint Funding, and Community**
   Proposal: Open the space to independent providers and work with health partners for joint funding. Prioritise developing communities by allowing local groups to use the centre as a social anchor.
   Saving: Shared funding reduces the burden on Adult Social Care. Recouping costs via service agreements while fostering community connections reduces the isolation that leads to mental health crises and service dependency.
5. **Addressing "Invisible Demand"**
   Proposal: Support ageing carers who provide home-based care without formal support. Provide equitable access to day provision for young people living in supported living where day provision is prohibited, as parent carers report private providers claim they meet need without considering holistic wellbeing and access to the community.
   Saving: Early engagement enables managed, cost-effective transitions rather than high-cost emergency interventions when families hit a point of crisis, and a reduction in care package costs where young people have access to social opportunities and more meaningful day activities.
6. **Address the lack of training and work opportunities**
   Proposal: develop opportunities for young people who do not meet Team Domenica eligibility criteria. There is great space within Wellington House for a community café, a community launderette, etc. PaCC suggests that BHCC look at The Sand Project in Worthing as inspiration for improving young people's access to better life outcomes.
   Saving: Families with young people still living at home can manage for longer where young people have daytime provisions that are meaningful.

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Other, in addition to survey questions.

- The independent market currently holds a significantly larger market share of daytime provision, and parent carers believe the smaller percentage held by Wellington House must be protected as In-House provision, protecting and building on provision for this vulnerable cohort.
- The quoted daily rate of £220 at Wellington House is a similar price being quoted by some current providers.
- **Loss of Accredited Excellence:** PaCC has read that Wellington House holds a National Autistic Society Autism Accreditation. Carers see this as a "gold standard" sensory environment that is not widely available in the private sector.
- **The "Social Anchor":** Beyond the 21 permanent users, the centre provides a vital safe space for "drop-in" users. Removing this hub increases the risk of those living in the community falling into total social isolation.
- **Trust remains low** because the community feels the narrative around decision making has been predominantly about the 21 adults who attend Wellington House,

and the needs of future cohorts risks not being evidenced as part of essential decision making.

Summary Conclusion for Voting Councillors

Closing Wellington House is a high-risk strategy prioritising short-term savings over stability. While projected savings are £400k, community confidence remains low. The "Invest to Save" model offers a sustainable path to mitigate crisis costs, uphold stat utory duties, and restore trust. Decisions now dictate whether the city remains inclusive or pushes its most vulnerable into a volatile market. Such action leaves no safety net for the adults involved and fails to provide a medium-to-long-term plan going forward for the eligible students with Learning Disabilities who will leave full-time education each year.

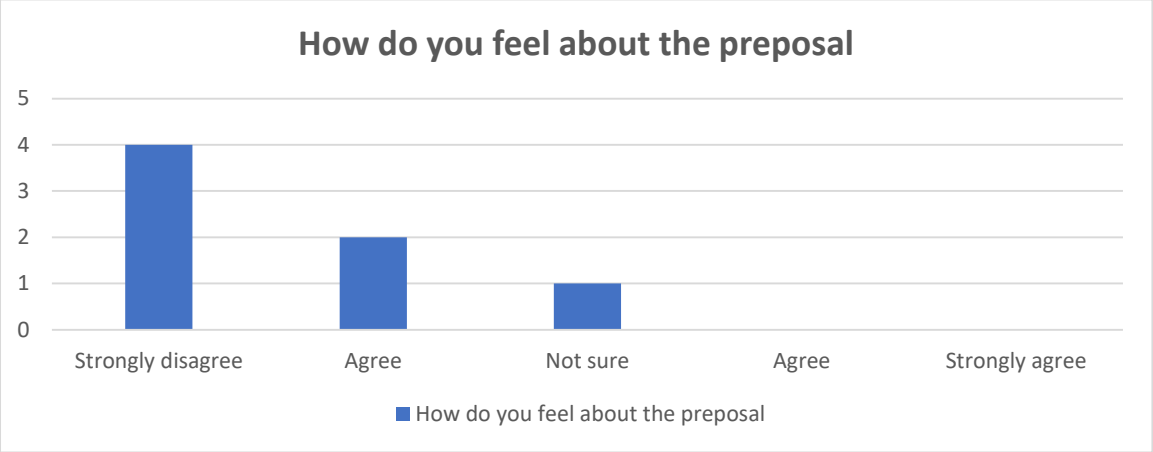
The Parent Carers' Council (PaCC) is a parent-led forum which represents parent carers with children and young people with any kind of physical disability, learning disability, complex or long-term medical/health condition, SEMH (Social, Emotional, Mental Health) issues or special educational need. The group was formed to enable parent carers to work closely together to help improve services and support. It aims to help parents get more directly involved in the strategic delivery of services for disabled children in Brighton & Hove and now has over 780 signed up members. Parent Carers' Council (PaCC), Community Base, 113 Queens Road, Brighton BN1 3XG • Tel: 01273 234 862 • email: fiona@paccbrighton.org.uk • www.paccbrighton.org.uk

Joe Jones
Engagement Coordinator
Speak Out
The Brighthelm Centre,
North Rd,
Brighton
BN1 1YD

Wellington house consultation – Peer Advocates Survey findings

Overview

The surveys were gathered during drop-in visits between the 18th of May and the 6th of June 2026. Participants were given a presentation on the council's proposal and an information pack. You can find both the information pack and the surveys attached. Those who were aware of the proposal were very vocal in their discontent, some filled out surveys, and some did not. In total, we took 7 completed surveys. I have compiled the responses into graphs below.

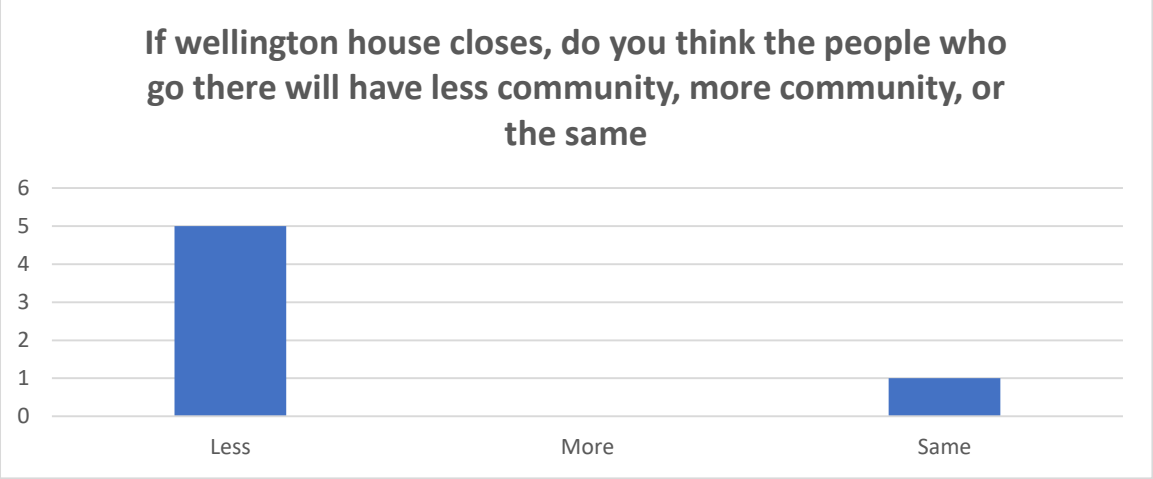


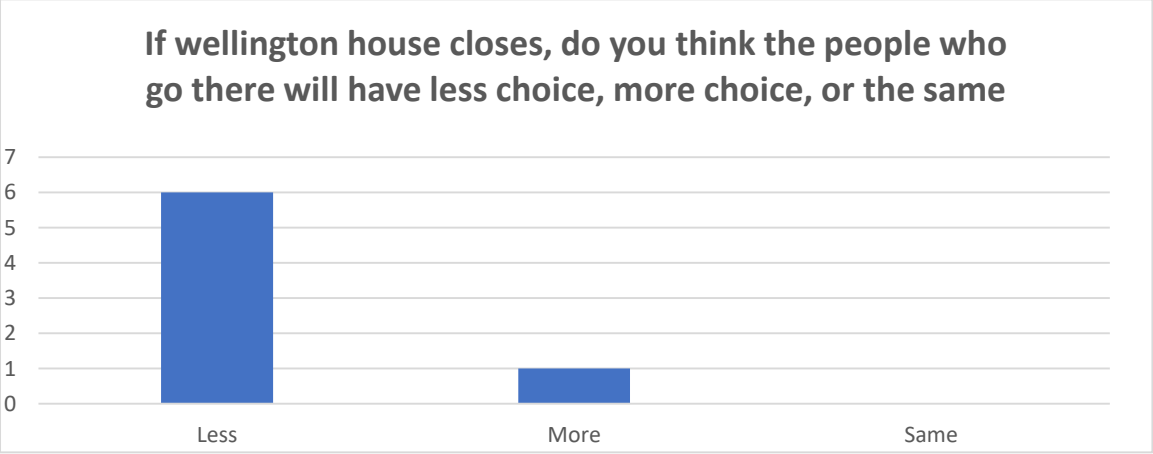
Why do you feel this way?

Respondent 1 (disagrees with the proposal)	*It makes me feel like people with learning disabilities wont have a community and that the support for people who need it the most should have the support they need*
Respondent 2 (disagrees with the proposal)	*Because it should stay us to help people with disabilities access this service as part of the day*
Respondent 3 (is not sure about the proposal)	Not sure as I haven't been there. I think it is sad because it will be hard for people to find somewhere else to go. There might not be as much choice
Respondent 4 (strongly disagrees with the proposal)	*I think it's stupid because people may live far away from the day centres where they've sent, and that's not fair.* *They may not be able to see their friends anymore.* *It's not fair on people because they've been going there for years and they might be upset that it's closing.* *They're going to miss their activities that they do there/ They'll get fed up, depending on how independent they are.* *They might not know the other day centres or how to get there*
Respondent 5 (strongly disagrees with the proposal)	*It is unfair to take away community spaces from vulnerable people. They go there for a reason so telling them to go somewhere else does not make up for the injustice. It will save the council money but the cost*

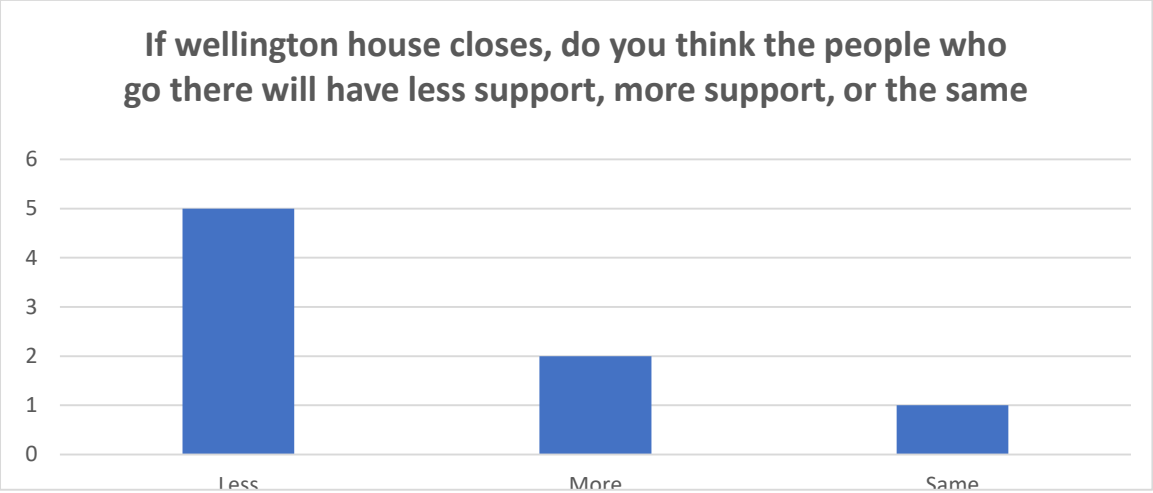
Joe Jones
Engagement Coordinator
Speak Out
The Brighthelm Centre,
North Rd,
Brighton
BN1 1YD

	will be transferred to charities who are already struggling. It is heartless.
Respondent 6 (strongly disagrees with the proposal)	*If you close it there are lots of services that have helped me a lot that will change.* *How can you guarantee the same standard of service with another provider and what happens if that new provider can't cope with the extra work and has to close also?* *It will be a shame because more people with learning disabilities won't have a voice and will get left behind.* *It will be lots of stress and pressure on parents and carers.* *We can't keep shifting services around to be someone else's problem.*





Joe Jones
Engagement Coordinator
Speak Out
The Brighthelm Centre,
North Rd,
Brighton
BN1 1YD



Conclusions

The issue that arose most frequently was the concern for the loss of Wellington House for the service users. There are themes of unfairness and the community being left behind. This is emblematic of the community's response to cuts, but it also speaks to members' own experiences of change and precarity. Secondarily, there is a general suspicion that there are no equivalent services available in the area to meet service users' needs, with one respondent emphasising the strain on charity services. Only one respondent was unsure about the proposal; their concern was that it would 'will be hard' to find another place to go. No respondents reacted positively to the proposal.

It should be noted that members who did not feel strongly about the proposal were unlikely to fill out a survey. The response I have had when discussing the potential closure has either been one of profound concern or relative indifference due to not understanding the issue. Those who do not know what Wellington house is, or even the few who were unaware of what a day service is, required significant support to understand the decision. I found that when I had the time to invest in supporting an individual like this, the same themes of precarity and marginalisation emerged.

Brighton and Hove UNISON Consultation Response Wellington House

This is our response as the trade union that represents the majority of the Wellington House workforce. Our answers are developed from a considerable number of meetings with Wellington House staff and discussions with parents, carers and stakeholder organisations during the months we have been representing and supporting our members at Wellington House and in our campaigning to protect and keep this service.

4 – Reasons for our answer

We strongly oppose the proposal to close Wellington House for a number of reasons:

- This is not just about individuals. Wellington House is a family and a community that has grown over decades. This simply cannot be replicated by farming service users out to a number of external providers.
- We believe there is a strong risk in cutting this provision without having properly done a needs assessment of adults with learning disabilities in the city that aren't currently engaging with day services and the financial implications of them not accessing quality day care. This cohort can and should be identified and encouraged to access Wellington House.
- The financial risks associated with home-care relationships breaking down and the council then having to fulfil its statutory duty to provide residential care are considerable. Just one premature breakdown in home-care would wipe out this saving in one year.
- The workforce at WH is one of the most experienced and skilled teams in terms of supporting service users with complex needs. Losing this team would be a huge drain of talent and organisational knowledge.
- There is considerable evidence that the potential of WH has not been explored and that there has been neglect and decline in the management and support of the service. There is a huge amount of untapped potential and that should be given time to be explored and developed.

6 – Potential risks and disadvantages

Risks include:

- External providers will not have the capacity and experience both in terms of infrastructure and workforce to deal with the level and complexity of need of this service user group.
- That any needs assessments will be invalid by the time the current WH service users accessed another service due to the subsequent disruption and

disregulation this would cause and taking into account the risk that the new service may not be appropriate.
- The medium- and long-term cost increase risks due to subsequent breakdown in home-care relationships.
- Reputational damage at a time where insourcing and excellent provision of community owned services and provision is seen so favourably by the public.

7 – Market readiness and sustainability

As a trade union that also represents hundreds of Brighton and Hove members working in the private/charitable/voluntary sector in the city we know that many not-for-profit and charitable providers are struggling with the increased costs of national insurance and the spike in the cost of some goods and services. We are aware that may providers are in financial stress, reducing their workforces and liquidising some of their assets. This means the sustainability and quality of the service is harder to ensure than keeping delivery in house. There is also a risk of providers 'over promising' to win contracts that they then struggle to deliver on.

8 – impact and quality of support

Please tick: reduced choice and flexibility, reduced quality of support, reduced community inclusion

Under 'other':

Having spoken to parents what cannot be underestimated is the profound loss the current WH users will experience if WH closes. They have established a family at the centre, and this family will be torn apart if the centre closes.

10 – council considerations – equality and inclusion

In terms of promoting equality and inclusion the council opens itself up to several risks if it closes the centre. The people who use the centre are not just unit costs, they are human beings. This decision should be based on what is best for them, not what saves money. This is one of the most vulnerable and potentially isolated groups in society and the council has already experienced reputational damage around this suggested closure.

The health and wellbeing outcomes for people with severe learning disabilities are profoundly worse than for the general population. On average they will die 15-20 years earlier than the general population with 50% of deaths deemed avoidable as they are related to treatable conditions. They are also significantly more likely to experience poor mental health, loneliness, social isolation, bullying and poverty. Wellington House is quite simply the best and most protective place for them to be.

11 – other considerations for the council

We would ask that the council remember that once a building is sold it cannot be sold again. This would be a one-off saving and a short-term answer to a medium/long term issue. There would also be the problem and cost of relocating staff when the few remaining main council buildings are already at or over capacity. Hove Town Hall is bursting at the seams and our members there continue to relay concerns around privacy, heat, overcrowding, accessibility and safety.

12 – alternative suggestions

UNISON's strong suggestion is that this closure should be stopped or at least shelved until a proper assessment of alternative models and ideas can be fully explored, actioned and assessed. We know that stakeholders, including the workforce, LD organisations in the city and parents/carers/family members have given some excellent alternative suggestions. We believe these have included making WH a centre for excellence around Learning Disabilities which could include proactively attracting more referrals to bring down costs per head; allowing external providers to spot purchase spaces for more challenging service users and the potential to hire out space and resources for activities.

From talking to staff and evidence we have seen from emails and communications from managers, the centre has not been managed well by those outside of the delivery workforce and has, intentionally or not, been allowed to slowly decline. There is also evidence that parents who have expressed a desire for their children to attend the centre have had their requests not actioned raising serious questions around transparency and intent.

While the workforce has become demoralised over time, their commitment and passion for the work they do has not dimmed, and if given the opportunity they would be skilled and active participants in developing and growing the service and improving its efficiency.

FORMAL REPRESENTATION | 14 JULY 2026

Proposed Closure of Wellington House

Formal representation from the Chair of Governors, Hill Park School

From	David Plant, Chair of Governors, Hill Park School
To	Councillor Mitchie Alexander; Councillor Bella Sankey
Cc	Councillor Emma Daniel; Councillor Jacob Taylor; Councillor Tim Rowkins; Councillor Jacob Allen; Councillor Trevor Muten; Councillor Gill Williams; Councillor Alan Robins; Councillor David McGregor; Councillor Sam Parrott; Deb Austin, Corporate Director, Families, Children and Wellbeing (deb.austin@brighton-hove.gov.uk); Democratic Services (democratic.services@brighton-hove.gov.uk)
Subject	Urgent formal representation from Hill Park School: proposed closure of Wellington House

Dear Councillor Alexander, Councillor Sankey and colleagues,

I am writing in my capacity as Chair of Governors of Hill Park School, following consultation with and the unanimous support of all non-conflicted governors who participated. Staff governors did not take part because of their employment-related conflict of interest. Hill Park serves children and young people across our Primary, Secondary and Hive sites. I am also the parent of a 16-year-old attending Hill Park Secondary.

Hill Park values its constructive working relationship with Brighton & Hove City Council. As a maintained special school and a vital part of the city's SEND provision, we work closely with council officers and services to support some of Brighton and Hove's most vulnerable children, young people and families, and we are committed to continuing that partnership. We recognise the severe financial pressures facing the authority. However, we believe that the proposed closure of Wellington House would be a serious strategic mistake, removing essential specialist capacity at precisely the time when the evidence from our school indicates that need is increasing.

Please treat this as a formal representation opposing the proposed closure of Wellington House Day Options and asking the council not to proceed on the basis of the evidence currently available.

Wellington House is the city's last council-run day centre specifically serving adults with learning disabilities. Its closure would remove an important part of the council's direct provision and, in particular, a potential safety net for adults whose complex needs cannot readily or reliably be met through ordinary community activities, charities or independent providers.

Failure to assess future demand

To my knowledge, neither Hill Park's governing body nor its senior leadership has been approached during the consultation for information about the children and young people who are likely to require adult social care provision in the coming years.

This is a significant omission. Hill Park educates children and young people with severe learning disabilities, profound and multiple learning disabilities, autism, physical disabilities, medical needs and other complex support requirements.

Our direct experience is that the complexity and intensity of need within the Secondary cohort are greater than in previous years. This pattern continues through the younger year groups and into Primary. The evidence available to us therefore points towards an increasing need for specialist adult day provision, not a diminishing one.

These pupils are the future users of Brighton and Hove's adult social care services. No credible assessment of future demand can be completed without engaging Hill Park and other specialist schools and post-16 providers and examining the needs of their current cohorts.

Hill Park recognises that Downs View School, Link College and Life Skills College should also be consulted by BHCC to ensure the relevant feedback and data sets are included from both special school sites in the city.

Existing public evidence

This concern is consistent with the council's wider published evidence. The Care Quality Commission's December 2025 assessment rated Brighton and Hove's adult social care arrangements as "Requires improvement". It identified gaps in provision for people with complex and compound needs, limited local options and insufficiently developed commissioning information about what provision would be required and when. [1]

The 2023 Ofsted and CQC Area SEND inspection also found that preparation for adulthood was underdeveloped and that there was insufficient strategic involvement from health and social care in this work. [2]

The Parent Carers' Council's response to this consultation has similarly raised the absence of adequate future-demand modelling, the lack of demonstrated safe alternatives for people with complex needs and the financial fragility of parts of the independent market. [3]

Hill Park's latest published Ofsted inspection judged the school Outstanding. Its leaders, staff and governors possess substantial professional and direct evidence about the changing needs of the city's disabled children. That evidence should form part of the council's strategic planning for adult services. [4]

Local government reorganisation and future service planning

This proposal is also being considered during a period of major structural change in local government across Sussex and Brighton. The Sussex & Brighton Strategic Authority was formally established in March 2026, while separate proposals for local government reorganisation remain under consideration. If approved, elections for new unitary authorities are proposed for May 2027 and new governance arrangements are targeted to become operational in April 2028. [5] [6]

This is therefore not an appropriate point at which to make an irreversible reduction in the city's directly operated specialist learning-disability provision. Before disposing of Wellington House, the council should establish how specialist adult social care will be planned and commissioned under the future arrangements, what needs exist across the wider area, and whether retaining the service could contribute to a more resilient regional network of provision.

Closing the facility now risks removing valuable public capacity immediately before responsibilities, commissioning arrangements and opportunities for regional service planning are reconsidered. At minimum, any decision should be paused until this work has been completed and independently tested.

The council should also avoid permanently dismantling directly operated provision at a time when the future funding, organisation and balance between public and outsourced delivery of adult social care are likely to be reconsidered nationally.

The financial case

I am not persuaded that the proposed saving has been demonstrated as a genuine net saving to the council or to the wider public sector.

Any proper financial assessment must include not only the operating cost of Wellington House but also:

- the cost and availability of comparable independent provision;
- transport and one-to-one or two-to-one staffing;
- clinical, behavioural, communication and personal-care support;
- the consequences of placements breaking down;
- increased pressure on family carers and respite services;
- emergency intervention and safeguarding costs;
- residential or out-of-area placements where suitable local provision is unavailable; and
- the cost of rebuilding provision if independent or charitable services subsequently withdraw from the market.

Removing a council-run service may reduce one budget line while transferring equal or greater costs elsewhere.

The Care Act requires the council to promote a sufficiently diverse, sustainable and high-quality care market and to secure services capable of meeting local needs. The Public Sector Equality Duty also requires the council to give

proper and demonstrable consideration to the impact of its decision on disabled people and their families. [7]

Actions requested

Before any recommendation is made to Cabinet, I ask the council to:

1. Produce a properly evidenced five- and ten-year forecast of demand for adult learning-disability day provision, incorporating anonymised cohort information from Hill Park and other specialist education providers.
2. Meet Hill Park's leadership and governors to understand the number, complexity and likely adult support requirements of pupils currently progressing through the school.
3. Publish the full financial model, options appraisal, market-sufficiency assessment, Equality Impact Assessment and transition risk assessment supporting the proposal.
4. Demonstrate, by category of need, where sufficient alternative provision currently exists for people requiring specialist buildings, personal care, clinical input, high staffing ratios, specialist communication support and management of behaviours that may present risks.
5. Assess alternatives to closure, including retaining and modernising Wellington House or developing it as a specialist centre of excellence alongside community-based provision.
6. Refer the proposal to the People Overview and Scrutiny Committee for examination before a final Cabinet decision is taken.
7. Confirm that this representation will be included in the formal consultation analysis and supplied in full to the councillors making the decision.

The council should not dispose of its final directly operated specialist day service without first establishing, through robust evidence, that future demand can be met safely, sustainably and affordably. At present, that case has not been made.

Please confirm receipt, whether this representation will be included in the decision papers, and the anticipated date and forum for the final decision.

Yours sincerely,

David Plant

Chair of Governors

Hill Park School - Primary, Secondary and The Hive

References

1. Care Quality Commission, Brighton and Hove local authority assessment (December 2025):
https://www.cqc.org.uk/care-services/local-authority-assessment-reports/brightonhove-1225/summary

2. Ofsted/CQC Area SEND inspection of Brighton and Hove (2023):
https://files.ofsted.gov.uk/v1/file/50218659

3. Parent Carers' Council response to the Wellington House consultation:
https://paccbrighton.org.uk/wp-content/uploads/2026/07/BHCC-Consultation-Survey-Proposed-Closure-of-Wellington-House-PaCC-response.pdf

4. Ofsted provider page for Hill Park School:
https://reports.ofsted.gov.uk/provider/25/114687

5. Brighton & Hove City Council, inaugural meeting of the Sussex & Brighton Strategic Authority (April 2026):
https://www.brighton-hove.gov.uk/news/2026/inaugural-meeting-sussex-brighton-strategic-authority-take-place

6. Brighton & Hove City Council, Local Government Reorganisation timeline:
https://www.brighton-hove.gov.uk/council-and-democracy/local-government-reorganisation-lgr/our-timeline-local-government-reorganisation-lgr

7. Care Act 2014, section 5 (market shaping and commissioning):
https://www.legislation.gov.uk/ukpga/2014/23/section/5

Brighton & Hove City Council

Consultation Engagement summary

Engagement Activity 1: Speak Out Engagement – Wellington House Service Users

Date: 7th May 2026
Participants: Service Users

This consultation has focused on a sensitive proposal affecting people supported at Wellington House. Throughout the process, extensive engagement has taken place with families, carers, staff, social workers, advocacy organisations, and representatives of the wider learning disability community to ensure that views and concerns are fully understood and reflected.

Following discussions with parents, carers, and social workers, it was agreed that people supported at the service would not be informed of the proposal at this stage. Families and carers raised concerns that discussing potential closure plans before any decision had been made and without the ability to provide clear reassurance about future arrangements, could cause significant anxiety and distress, particularly for autistic individuals, it was therefore agreed that, if a formal decision is made, information would be shared at the appropriate time and in a way that is tailored to each individual's communication and support needs.

Speak Out were able to support engagement and completed a visit to the service to consult on what was important to attendees, things they enjoy and friendships. Speak Out were able to complete their report without referencing the potential closure plans.

Key findings:

Feedback from service users was overwhelmingly positive. Participants consistently described Wellington House as a place they enjoy attending, using phrases such as:

- "I love it."
- "It's fun."
- "It's good. I love it."
- "When I walk through the door, I feel happy."
- Most surveyed individuals selected positive emotional responses when asked about their experience of the service.
- Strong satisfaction with the service and positive emotional responses.
- Friendships and social connections are highly valued.
- Staff recognised as caring, knowledgeable and responsive.
- Meaningful activities and community participation are highly valued.
- Routine, familiarity and stability support wellbeing.

Summary: Service users expressed overwhelmingly positive views and highlighted the importance of relationships, routine, and specialist support.

Friendships and relationships have been captured within individual reviews and

commissioners and social work managers are aware of the groupings that would like to stay together with any new proposed reprovision.

Any new provider would need to assure that they will provide valued meaningful activities and community participation through a scheduled week of activities devised to meet the needs and desires of the group supported.

Engagement Activity 2: Learning Disability Partnership Board

Date: 30th April 2026
Participants: Partnership Board Members

Key findings

- Discussion of financial rationale for proposal.
- Concerns regarding service continuity and future demand.
- Concerns regarding market capacity and complex needs provision.
- Need to be evidence regarding alternative provision.

Summary: Members emphasised the importance of ensuring future provision can meet current and future demand.

Engagement Activity 3: Parent Carers' Council (PaCC) and AMAZE

Date: 19th May and 2nd June 2026
Participants: Parent Carers' Council Members and Stakeholders

Key findings

- Financial savings versus service quality.
- Capacity and suitability of alternative provision.
- Future demand for services.
- Impact on individuals and families.
- Trust, transparency, and consultation integrity.

Summary: Parent Carers' Council and AMAZE requested robust evidence that alternative provision can safely replicate current outcomes.

Engagement Activity 4: Learning Disability Partnership Board Link Group - focused discussions

Date: 8th June 2026
Participants: People with lived experience

Key findings

- Strong opposition to closure.
- Concerns regarding loss of community and belonging.
- Impact on wellbeing and independence.
- Need for accessible communication and advocacy.

Summary: The response from Speak Out Link Group Peer Advocates demonstrates strong concern about the loss of a valued community resource, uncertainty about the

suitability of alternative provision, and fears regarding the impact on wellbeing, social inclusion, and support networks. Respondents consistently emphasised themes of community, continuity, fairness, and protecting vulnerable people from further disadvantages.

Engagement Activity 5: Family and Carer Engagement Meeting

Date: 9th June 2026
Participants: Families and Carers

Key findings:

- Continuity of care and transition planning.
- Provider quality and capability.
- Support for people with complex needs.
- Market capacity and value for money.
- Alternative options to closure.

Summary: Families and carers sought reassurance regarding quality, safety, and continuity.

Engagement Activity 6: Provider Engagement Event

Date: 30th June 2026
Participants: Providers, Families and Carers

Key findings

- Providers outline service models and capacity.
- Families met providers and discussed support options.
- Some service visits arranged on request of carers

Summary:

- The Provider engagement meeting on 30th June provided an event for families and carers to meet and discuss the “potential” Day opportunity provision options with the independent day service providers in the city, that are referenced as part of the formal consultation document. To ensure that everyone is fully informed about the Provider Market and what is available, to support engagement with the Formal consultation.
- On the day Providers were able to discuss their current capacity and ability to expand their capacity to meet proposed demand. They were also able to discuss usual practice of working to capacity, and not operating with vacancies, as it would not be financially viable for them to employ staff and run with vacancies. Leaflets with written information on each service were available to share with attendees.

Engagement Activity 7: Family and Carer meeting with Councilor Mitchie

Brighton & Hove City Council

Alexander

Date: 30th June 2026
Participants: Families and Carers

Summary: Why Wellington House is being considered for closure and whether alternative savings are available. Impact on long-term service users, many attending for decades. Concerns about trust, previous promises, and consultation transparency. Loss of choice, specialist provision, and suitable alternatives. Potential false economy due to increase in respite and residential care costs. Calls to improve and modernise the service rather than close it.

Summary Parent Carer Survey Wellington House Feedback- Your Voice

Summary Parent Carer Survey Feedback: 23

1. What is your relationship to the person who uses day services?

23/23 - Multiple choice - choose one - required

Parent/carer 56.5% (13 choices)

Shared Lives Carer 17.4% (4 choices)

Other family carer 13% (3 choices)

Other (please specify) 13% (3 choices)

Please provide details about the person you care for (tick all that apply)

23/23 - Multiple choice - choose many - optional

Learning disability 100% (23 choices)

Autism 78.3% (18 choices)

Mental health needs 43.5% (10 choices)

Complex health needs 39.1% (9 choices)

Physical disability 8.7% (2 choices)

Other (please specify and add more information where appropriate) 21.7% (5 choices)

3. What works well about the current day service provision?

-The strongest theme is the quality and consistency of staff. Respondents repeatedly said staff are highly trained, experienced, compassionate, and know service users very well, often over many years

. Families particularly value staff's understanding of autism, complex behaviour, and early signs of distress, and their ability to provide safe de-escalation and tailored support

Safety, routine and familiarity were also mentioned very often. People described Wellington House as a safe, predictable environment with structure, regular people, and established routines, which helps reduce anxiety and supports mental wellbeing

. Several highlighted the importance of individual rooms or quiet spaces where people can regulate, take time out, or avoid becoming overwhelmed

. Another common point was that the smaller-scale setting suits people who struggle in larger, noisier groups. Respondents said it allows for 1:1, 2:1, small group support, and flexibility for those with more complex needs or who cannot always access the community

. One response described the service as a last resort for people whose needs are not met elsewhere

. Social connection was another clear benefit. Families said the service helps build friendships, offers a genuine peer group, and gives service users a social life in a place where they feel accepted and listened to

. Activities and community access were viewed positively, including creative programmes, arts, gardening, allotment work, outdoor space and supported trips out

. Transport was also valued where mentioned

. A final recurring point was the benefit to families and carers: the service provides reassurance, respite, and confidence that loved ones are safe, supported and happy

4. Do you experience any challenges or difficulties with the current service?

21/23 - Multiple choice - choose one - optional

No 82.6% (19 choices)

Yes 8.7% (2 choices)

No answer

8.7% (2 choices)

5. If yes, please describe below:

3/23 - Short answer - optional

All responses (3)

The hours of care 10:30 - 3pm with no transport provided make it hard for me to return to work.

This service is well run and provides exemplary support and care for both Service users and those who care for them

Sometimes transport is very late arriving, and my son gets very agitated

6. Please tell us about the impact this day service has on your role as a carer?

-Respondents most often described Wellington House as essential respite for carers, giving them a few hours to rest, attend appointments, run errands, see family and friends, and in some cases work or consider returning to work

. Several said this break helps prevent exhaustion or burnout and makes caring at home manageable. A strong theme was reassurance: families trust that their relative is safe, well looked after, happy, and in a calm environment while attending

. This peace of mind was especially important where carers also support other relatives or have additional caring responsibilities

. Many also valued the benefits for the person attending: maintaining routine, staying calm, enjoying activities, mixing with peers, accessing the community, building independence, and improving wellbeing

. Respondents felt the service supports both mental health and stability at home. There was repeated concern about the impact if the service closed. People feared distress, loss of routine, increased pressure on carers, breakdown in home life, and worse outcomes for those with high or complex needs

Page 6: Views on the proposed change

. Overall, to what extent do you support or oppose the proposal?

23/23 - Multiple choice - choose one - required

Strongly oppose the proposal 95.7% (22 choices)

Tend to oppose the proposal 4.3% (1 choice)

Strongly support the proposal

0% (0 choices) Tend to support the proposal

0% (0 choices) Neither support **nor oppose the proposal**

8. What do you see as the potential benefits of re-providing support through external provider services?

Most respondents saw no benefits in re-providing support through external providers. This was by far the dominant view, with several giving very direct answers such as “none” or “I don’t”

. The main concern was that external providers would not be able to meet complex needs as well as Wellington House. Respondents stressed the importance of

experienced staff who know individuals well, 1:1 support, calm and quiet environments, structured person-centred programmes, and safe spaces for people to withdraw when needed

. One response argued that Wellington House is one of the last places for people who do not fit the “commercial model” of existing services

. There was also doubt about whether enough suitable external provision exists at all. Respondents said current options are very limited and already stretched, and some questioned whether the expected financial savings would actually happen

. A small number saw possible benefits only if there were major improvements: better surroundings, experienced staff, good resources, and opportunities for younger people, more activities, outings, drop-in support, and evening use of the building

. Even these comments tended to focus on developing Wellington House rather than replacing it with external provision.

9. What do you see as the potential risks or disadvantages of re-providing support through external provider services?

The main concern was that external providers would not be able to meet people’s complex needs as well as Wellington House, particularly for autistic people and those needing highly individualised or 2:1 support

. Respondents repeatedly said Wellington House staff know people extremely well, can recognise early signs of distress, de-escalate effectively, and understand personal routines, communication and care needs. There was strong worry that this knowledge would be lost with new providers, alongside concerns about staff experience, training and retention

. A very common theme was the harmful impact of change. Families said unfamiliar staff, buildings, routines, activities and transport could cause significant anxiety, stress and distress, and that for some people this is not something that can simply be managed

. Several feared increased challenging behaviours, deterioration in wellbeing, and even breakdown of home placements if support does not work

. Many also doubted whether alternative settings are suitable. Concerns included overcrowding, noisy or fast-paced environments, insufficient space for individual support, and loss of specialist facilities such as sensory rooms, gardens, kitchens and allotments

. Some said private sector options are too financially driven and not designed around this group’s needs. Another repeated issue was the loss of relationships and

continuity: familiar staff, peers, friendships and transport were seen as important parts of support, and respondents worried these would be broken up

. A few specifically highlighted that no other provider offers Autism Accreditation, making respondents question whether equivalent specialist provision exists at all

Page 9: Carer concerns and risks:

10. What concerns would you have if the day service closed? (tick all those that concern you)

23/23 - Multiple choice - choose many - required

Loss of routine or familiar environment 95.7% (22 choices)

Anxiety or distress for the person I care for 91.3% (21 choices)

Suitability of external providers 87% (20 choices)

Staff skills and understanding of complex needs 78.3% (18 choices)

Impact on friendships 69.6% (16 choices)

Travel or transport difficulties 43.5% (10 choices)

Impact on my ability to work or manage other responsibilities 43.5% (10 choices)

Loss of respite for carers 39.1% (9 choices)

Concerns about costs 34.8% (8 choices)

Other (please specify) 13% (3 choices)

11. Are there specific risks around the proposal that you are you are worried about in relation to the person you care for?

The main concern raised repeatedly is that changes to Wellington House would be very distressing for people who struggle with any disruption to routine. Respondents often said this could lead to heightened anxiety, poor sleep, self-harm, aggression or other challenging behaviour

. A common theme is that Wellington House provides stability, familiar staff, friendships and a trusted routine, and that losing these could seriously affect mental health, wellbeing and behaviour. Several respondents felt the people they care for would struggle to cope in a new setting, especially if it is noisier, busier or less suited to their needs

. Respondents also worried that specialist knowledge and experienced staff would be lost, and that replacement provision may not have enough staff, space or understanding to manage distress safely. Some said this could unfairly set people up to fail and would also have a negative impact on family life at home

. Other concerns mentioned were the loss of long-standing friendships, increased vulnerability in unfamiliar transport arrangements such as taxis, and communication difficulties making anxiety worse

. One response also warned that if the change caused a care placement to break down, any expected savings could be outweighed by the cost of alternative support

12. Are there specific impacts around the proposal that you are worried about for you as a carer?

The main concern was the effect on the person cared for becoming distressed, anxious or unsettled if Wellington House closes or changes. Several carers said they would then have to manage more challenging behaviour at home, including aggression, hitting or biting and that this could undo years of progress and stability

. A strong theme was the knock-on impact on carers' own wellbeing. Respondents described the situation as mentally exhausting and distressing, with worries about coping day to day, their own health, sleep, and their ability to continue caring at home long term

. One single parent said a reliable day service is essential to manage both caring and everyday responsibilities

. Some were also worried about wider effects on the whole family and other people they care for, as well as the risk of the person becoming isolated at home if an alternative placement fails

. A few highlighted practical concerns such as possible loss of transport

. There was also a clear lack of confidence that other providers could match the specialist support, understanding and consistency currently provided by Wellington House. One respondent felt families were not being listened to and that people with autism and learning disabilities were being treated as "numbers" rather than individuals

. A small number gave no concerns or no meaningful answer.

Page 12: What would need to be in place:

13. If changes went ahead, what would be most important to you? (Please tick all that apply)

22/23 - Multiple choice - choose many - optional

Continuity of staff 91.3% (21 choices)

Involvement of carers in planning 82.6% (19 choices)

Choice of provider 78.3% (18 choices)

A gradual, well-planned transition 73.9% (17 choices)

Small group or specialist provision 69.6% (16 choices)

Advocacy support 65.2% (15 choices)

Continued friendship groups 56.5% (13 choices)

Continued access to transport support 43.5% (10 choices)

No answer 4.3% (1 choice)

Other (please specify) 26.1% (6 choices)

14. What would make you feel more confident about external provision?

The strongest theme was lack of confidence in external provision, with several respondents saying plainly that nothing would reassure them, or that they would only feel confident if Wellington House stayed open

. Linked to this was distrust in the process, including a view that decisions may already have been made and that previous promises have been broken

. Where respondents did suggest what would help, the most common point was continuity: keeping familiar staff, keeping friendship groups together, and ideally moving current staff and peers with the person into any new arrangement

. Respondents also stressed the need for experienced, skilled staff who understand people’s complex needs, rather than inexperienced staff learning on the job

. Other points mentioned were wanting a genuine choice of provider, opportunities to meet any new provider in advance, reassurance that support would continue if problems arise, and having a suitable local building if the site changes

. Overall, respondents were mainly concerned about disruption, loss of trusted relationships, and whether external services could safely meet complex needs.

Page 14: Support during change:

22/23 responses

15. What support would you need during any transition? (Please tick all that apply)

22/23 - Multiple choice - choose many - optional

Regular updates

91.3% (21 choices)

Face-to-face visits/meetings

73.9% (17 choices)

Carer support or advice

73.9% (17 choices)

Written information in accessible formats

65.2% (15 choices)

Advocacy

56.5% (13 choices)

No answer

4.3% (1 choice)

None

0% (0 choices)

Other (please specify)

17.4% (4 choices)

Page 15

23/23 responses

16. Is there anything else you would like the council to consider before a decision is made?

23/23 - Short answer – optional

Respondents most often asked the council to prioritise the wellbeing, safety and individual needs of current service users over cost-saving, stressing that these are vulnerable people “not numbers” who often cannot speak for themselves

. Many emphasised duty of care, and the importance of preserving the safety, support, routine and familiarity people currently get at Wellington House

. A strong theme was concern about the impact of change on people with complex needs, especially those who take a long time to settle or rely heavily on structure and trusted relationships

. Families worried that closure or transfers would cause distress, anxiety and instability for both service users and carers. Several responses questioned whether suitable alternative placements really exist. Concerns included limited capacity among other providers, lack of expertise to support complex needs, uncertainty about long-term provision, and what happens if placements break down

. People wanted reassurance about a proper safety net rather than being left with no realistic service option. There were also calls for clearer information and transparency about why the change is happening and what options are genuinely available

. One detailed response argued families have not been given enough time or information to assess alternatives properly before consultation ends

. A smaller number suggested keeping Wellington House open in some form, for example by transferring the building to a new provider and retaining staff under new management

17. Do you have any other alternative suggestions to this proposal that the council could deliver?

Most respondents wanted Wellington House to stay open, arguing that closing or changing it would cause unnecessary stress and harm for disabled people and families, for only a small financial saving

. A very common theme was that Wellington House is underused rather than unviable. Several respondents said the council should promote it better, improve referrals, and advertise it more widely to schools, colleges and families so more people know it exists and can access it

. Some also questioned whether people have been turned away or not referred despite spare capacity. Many suggested making fuller use of the building to reduce costs: renting space to other providers, leasing the building or parts of it, and hiring it out for evening/weekend activities, clubs, classes, events or social use

. Related to this, some proposed bringing in an outside provider to run the service while keeping the building and existing experienced staff

. There were also suggestions for a more flexible model rather than closure, such as shared use with other providers, dual placements, rotating activities across services, and using community venues for some sessions while keeping Wellington House for higher-support activities

. A smaller but notable point was that respondents want clearer, more detailed cost information, including whether current attendance levels, unused capacity and individual staffing arrangements have been properly assessed before decisions are made

Page 16: Final thoughts:

21/23 responses

18. Is there anything else you would like decision-makers to understand about how this proposal could affect you or the person you care for?

Respondents overwhelmingly describe the proposal as highly distressing and potentially devastating for people who use Wellington House and for their families and carers. The strongest recurring theme is that service users have complex, severe needs which respondents do not believe other services could safely or appropriately meet

. Many say Wellington House is not just a day service but a vital, stable part of people's lives: a safe environment, a main reason to leave the house, a place for friendship, routine, social contact and being understood

. A repeated concern is that removing this routine would increase anxiety, worsen health and behaviour, and "turn lives upside down"

. Carers also frequently stress the knock-on impact on themselves: more stress, poorer mental health, major disruption at home, and the burden of trying to manage increased anxiety and change

. Several frame this as a matter of dignity, rights and how society treats its most vulnerable members

. Another recurring issue is doubt about the practicality of the proposal, especially whether all current users could actually be placed successfully elsewhere

. Overall, respondents want decision-makers to recognise that these are individuals with complex needs, not numbers on a spreadsheet, and that keeping Wellington House open is seen as essential to their safety, wellbeing and quality of life

Stakeholder Feedback Wellington House - Your Voice

Questions

Total 56 responses

Page 1: About you

56/56 responses

1. Which of the following best describes your relationship to the service? (Select all that apply)

56/56 - Multiple choice - choose many - required

Member of staff based at Wellington House (SCDS)58.9% (33 choices)

Member of staff at Wellington House Day Options Service 17.9% (10 choices)

External care provider / voluntary or community organisation 8.9% (5 choices)

Health partner 3.6% (2 choices)

Advocate 0% (0 choices)

Other (please specify) 14.3% (8 choices)

2. Are you responding as:

56/56 - Multiple choice - choose many - required

An individual 85.7% (48 choices)

On behalf of an organisation (please name) 14.3% (8 choices)

Other responses (8)

Page 3: Views on the proposal:

56/56 responses

3. Overall, to what extent do you support or oppose the proposal?

56/56 - Multiple choice - choose one - required

Strongly oppose the proposal 53.6% (30 choices)

Tend to oppose the proposal 26.8% (15 choices)

Neither support nor oppose the proposal 14.3% (8 choices)

Strongly support the proposal 3.6% (2 choices)

Tend to support the proposal 1.8% (1 choice)

4. Please explain the reasons for your answer:

56/56 - Short answer - required

Most respondents expressed strong concerns about the proposed closure of Wellington House Day Centre, emphasising its vital role for people with learning disabilities (LD) and the wider community

A recurring theme was the lack of alternative provision and limited capacity elsewhere, with several highlighting that other providers cannot meet current needs

Respondents also noted the importance of the centre as a safety net for those who do not fit with private providers

Many stressed the negative impact on service users, particularly those with complex needs who may struggle with transitions and require a calm, familiar environment

The integrated nature of the service, with day centre and SCDS office together, was seen as beneficial for cohesive, multidisciplinary support

Concerns were also raised about the potential loss of employment and the broader impact on the whole building and integrated team

Some respondents questioned whether closure would deliver the intended savings for the council

Overall, the dominant view was that Wellington House provides essential, accessible support that cannot easily be replaced, and closure would have significant negative consequences for service users, staff, and the community.

5. What do you see as the potential benefits of re-providing support through external provider services?

Most respondents expressed significant concerns about re-providing support through external provider services, with many stating there are no benefits or that the change would be detrimental, especially due to a lack of suitable provision in the city for those with complex needs.

Several highlighted the importance of consistency and established relationships for service users, warning that disruption could lead to increased challenging behaviour and poorer mental health.

A few respondents acknowledged potential benefits, such as the possibility of more choice, new opportunities, or a refresh of services, but these were often caveated with concerns about losing current service quality or continuity.

Some noted that benefits might only arise if a skilled alternative provider could replicate or improve on current provision.

There were also comments about the lack of evidence that external providers would offer better or more cost-effective services, and that council resources should be optimised rather than outsourced.

One response mentioned the potential for the council to sell the building but flagged the risk of service users being left without appropriate day care.

Overall, the dominant trend is scepticism and concern about the adequacy and suitability of external providers, with only limited and conditional support for potential benefits.

6. What do you see as the potential risks or disadvantages of re-providing support through external provider services?

Respondents most frequently raised concerns about the loss of specialist knowledge and experienced staff, with several highlighting that Wellington House staff have many years of experience and that external providers often have high staff turnover

There is a strong emphasis on the risk that external provision will not meet the complex and individual needs of service users, leading to distress, trauma, and disruption for both users and their families/carers

Many respondents are concerned about the lack of suitable alternative provision, with some warning that this could result in more people entering full-time care or costly specialist accommodation, and increased risk of family breakdown

There is also concern about the loss of Wellington House as a valuable resource and safety net, especially as other in-house services have already closed

Additional risks suggested included negative impacts on users' mental health, and the likelihood that some users will refuse to engage with new providers

Overall, the main themes are the risk of unmet needs, loss of expertise, disruption to vulnerable individuals, and insufficient alternative provision.

7. What risks or opportunities do you see in relation to market readiness and sustainability?

The most common concern raised by respondents is the lack of capacity among existing providers to accommodate additional service users, especially those with complex needs

Several respondents question whether the 21 spaces referenced in the consultation exist and highlight that most providers are already at or near capacity, without plans to expand. There is also concern that the needs of those leaving college and requiring day services each year have not been accounted for. Another recurring theme is the risk that the anticipated financial

savings from changing provision may not materialise, especially when considering the potential increased costs of care, support, and bespoke packages

Some respondents also raise ethical concerns about treating learning disability provision as a market and warn of the risk of corporate providers exploiting staff and delivering substandard services

There are worries about the suitability of alternative services, particularly for those coming from Shared Lives placements and the stress and challenging behaviour that could result from service users having to adapt to new environments and staff

A few respondents note potential opportunities, such as greater choice for service users and the possibility of more responsive services, but these are generally seen as theoretical or outweighed by the risks

Overall, the dominant trend is scepticism about market readiness and sustainability, with significant doubts about capacity, cost-effectiveness, and the impact on service users.

Page 7: Impact and quality of support

56/56 responses

8. What impact do you think this proposal could have on people who currently use the service? (Select all that apply)

56/56 - Multiple choice - choose many - required

Reduced quality of support 75% (42 choices)

Reduced choice and flexibility 58.9% (33 choices)

Reduced community inclusion 55.4% (31 choices)

Improved community inclusion 7.1% (4 choices)

Improved choice and flexibility 5.4% (3 choices)

Improved quality of support 3.6% (2 choices)

No significant change 3.6% (2 choices)

Other (please specify) 32.1% (18 choices)

Respondents most often expect negative impacts on current users, especially reduced community inclusion, reduced choice and flexibility, and reduced quality of support. Many describe Wellington House as a familiar, safe and structured environment, and think losing it would be very distressing. A strong recurring theme is emotional harm: anxiety, grief, rejection, confusion, loss and difficulty coping with change were mentioned repeatedly

Several responses say disruption to long-established routines and relationships could lead to serious distress, dysregulation and lasting trauma

Another major concern is the loss of trusted staff, personalised support and a specialist base. Respondents worry that alternative or private provision would be more stretched, less tailored, and less able to meet complex needs, with people becoming “just another number”

Some also raised concerns about poorer joined-up working if health staff are no longer based with council staff

Loss of friendships, peer groups and social contact was also mentioned often. Respondents fear people would become more isolated, lose bonds built over years, and see worse health outcomes as a result

Several responses also highlight knock-on effects for carers and families, including increased caring responsibilities, stress, and possible breakdown in support at home

A smaller number said they could not judge the impact without more detail about the replacement provision, though even these responses noted that service users are likely to prefer stability and may not respond well initially to change

9. What would good support look like under the proposed new arrangements?

Many respondents emphasised the importance of continuity and consistency in support, particularly maintaining existing communities and relationships among service users

Several highlighted concerns about disruption and the negative impact of breaking up established groups. A recurring theme was the need for experienced, well-trained, and consistent staff, with some suggesting that support staff known to service users should remain with them

Respondents also stressed the importance of person-centred, tailored support, including flexibility in hours and activities, and a focus on individual needs

Concerns were raised about the lack of clarity and transparency in the proposals, particularly regarding provider capacity and the future of Wellington House

Some felt the options did not adequately address the needs of those with complex requirements

There was support for maintaining or increasing building-based day services, with suggestions for expanding capacity and offering additional drop-in or short break options

Community access and strong links to local services and families were also seen as important

Overall, respondents prioritised continuity, experienced staff, tailored support, and minimal disruption, while expressing concerns about capacity, transparency, and the adequacy of the proposed arrangements for those with higher needs.

10. What should the council consider in promoting equality and inclusion?

37/56 - Short answer - optional

Respondents most frequently emphasised the importance of understanding and meeting the individual needs of service users, particularly those with learning disabilities (LD), autism spectrum conditions (ASC), and other complex needs

There was a strong call for the council to ensure that both service users and staff are actively included in decision-making processes, with an emphasis on listening to those who know the users well and not overlooking staff perspectives

Several responses highlighted the need for good accessibility, skilled communication, and cultural sensitivity, with attention to both individual and group needs

The importance of continuity of care and support, to avoid loss of knowledge about individuals, was also mentioned

Some respondents suggested making better use of the available space to bring the community together and to provide for a wider range of groups, including young people aged 16–25 and other community groups during evenings and holidays

Equity, health inequalities, and the need to reflect the voices of those affected were also noted as important considerations

11. Is there anything else you would like the council to consider before a decision is made?

Respondents most frequently emphasised the importance of considering the wishes and needs of current service users and their carers, as well as the potential negative impact on these individuals if the centre were to close or change significantly

Several responses highlighted the value of the relationships and specialist knowledge built up by staff over many years, warning that these should not be sacrificed for perceived financial savings

Concerns were also raised about the risks to families, carers, and staff, and the need to assess whether external providers have sufficient capacity to meet needs if changes are made

The potential for increased costs in the future, should individuals need to be placed in more expensive services due to the loss of Wellington House, was mentioned

Some respondents suggested creative thinking to maximise the use and efficiency of the space, including reorganising services to offer more capacity

There was also a call for a safety net for service users who may not thrive with private providers and a suggestion to improve the consultation process itself

12. Do you have any other alternative suggestions to this proposal that the council could deliver?

Most respondents strongly oppose the closure of Wellington House Day Options, with repeated suggestions to keep the service open and seek savings elsewhere within the council rather than targeting services for vulnerable people

Several recommend reorganising or reducing the service instead of shutting it down entirely

There is a call for increased marketing to boost attendance and revenue, aiming to restore the service to pre-pandemic levels

Some responses highlight the need for genuine consultation and for the council to listen to experienced staff and stakeholders, rather than conducting what is perceived as a token exercise

A few respondents mention that alternative office spaces may not meet the needs of the SCDS team

Overall, the main trend is a strong preference for maintaining the service and finding alternative cost-saving measures that do not impact the most vulnerable.

Appendix 11- Information for the benefit of Councillor's

Wellington House Day Opportunities Service: Council response to Wellington House Consultation feedback:

Maintaining friendships, relationships and support networks

The importance of friendships, relationships and established support networks was a consistent theme throughout the consultation process. Information regarding significant friendships and social connections has been captured through individual Care Act reviews. Commissioners and social work managers are aware of individuals who have expressed a preference to remain together should alternative provision be required. This information will inform any future transition planning. Should the proposal proceed, any alternative provider would be required to demonstrate how it will maintain and support social inclusion and community participation. Providers would also be expected to deliver meaningful, person-centred activities that reflect the interests, aspirations, and support needs of those attending the service.

Transition arrangements and individual support

No final decision has been made regarding the future of Wellington House. Should Cabinet approve the proposal, a comprehensive and person-centred transition process would be implemented for each individual currently attending the service. This process would involve families, carers, social workers, health professionals, and providers to ensure that individual needs and preferences are fully considered. Transition planning would include consideration of friendship groups, communication needs, health requirements, and personal outcomes. Where appropriate, Mental capacity assessments and best-interest decision-making processes would be undertaken in accordance with the Mental Capacity Act 2005. Independent advocacy support would be available where indicated.

Alternative Day opportunity provision

The proposal would involve reprovisioning support through independent sector day opportunity providers operating within the city. Currently, approximately 86% of day opportunities for adults with learning disabilities are provided through the independent sector. Should the proposal proceed, all individuals currently attending Wellington House would continue to receive equitable Day opportunity provision. Any alternative provision would be required to demonstrate that it can meet the assessed needs of individuals currently attending Wellington House, including those with complex support requirements, communication needs, behavioural needs, and health conditions. A six-week placement review would be completed for each person, to include feedback from the individual where they have the capacity to contribute along with families' carers, providers and other professionals involved in the person's care. An annual social care review will be in place which would be sooner if there is a change in need or concerns are raised. Carers assessments would be reviewed as part of the review process. Updated contract specification requirements and contract reviews would provide additional ongoing monitoring and assurance.

Current and future demand
Demand for Wellington house has reduced over recent years. There have been declining attendance and declining referrals to Wellington House in 2024 and 2025.

A review of day opportunity needs has established that there are no projected required placements at Wellington House Day options for current 16 and 17 yr olds.

Most day opportunity placements in the city continue to be for young adults aged 25-34 with an increasing number of placements also being commissioned in the 19-24 age range and above 34 years of age. We will need a flexible, responsive, cost-effective day opportunity market going forward to be able to respond to this need. Due to the increased unit costs Wellington house is no longer a viable option.

Wellington House Building
The building is no longer considered fit for purpose as a contemporary day opportunities facility. A substantial Victorian era building, it was not designed to support the range and complexity of needs seen today and would require significant investment to adapt it to modern standards. The ageing infrastructure also requires increasing levels of maintenance, reducing the flexibility and efficiency of service delivery and limiting the building's capacity to meet future requirements.

Provider engagement and market capacity
As part of the review process, Commissioners have engaged with Day opportunity providers currently operating within the city. Discussions have focused on current occupancy levels, capacity, capability, and the potential to expand provision should additional demand arise. Market engagement has confirmed sufficient capacity to meet these individuals' assessed needs. Through current capacity for 16 individuals and creation of additional capacity for 2 individuals with an existing provider newly commissioned to support specialist high care needs for people in the city. This work forms part of the Council’s wider commissioning and market sufficiency responsibilities.
3 further individuals will be moving to alternative care arrangements due to 2 changes in need and 1 preference to arrange support through a higher Direct Payment rather than attend a commissioned day opportunity service.

Consultation process
Families, carers, and stakeholders were informed that savings are required across Adult Social Care services and that Wellington House was identified for review due to cost and falling demand considerations. Officers emphasised throughout the consultation that no final decision has been made and that all consultation responses, survey feedback, and stakeholder representations will be considered before Cabinet reaches a decision.
There has been a robust 12-week Consultation and engagement process for Families carers and stakeholders.
Wellington House staff have had the opportunity to engage with Managers and

Councillor Mitchie Alexander. Staff have also been provided with opportunities to participate in the consultation process through online and paper-based feedback mechanisms. Should the Wellington House service be agreed to proceed to closure a Staff Consultation would inform next steps for staff members. SCDS staff and the Cherish manager would also require a Staff Consultation process.

Brighton & Hove City Council

Cabinet Agenda Item 50

Subject: **DFT - Structures Bid - King Arches Phases 6 & 7**

Date of meeting: **Thursday, 3 September 2026**

Report of: **Cabinet Member for Transport & City Infrastructure**

Lead Officer: **Corporate Director- Operations**

Contact Officer: **Nick Bean**

Email: Nick.Bean@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key: Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000 and Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

1.1 Cabinet is requested to approve the inclusion of a £4 million Brighton & Hove City Council contribution alongside a proposed £37 million bid to the Department for Transport's Structures Fund for Phases 6 and 7 of the A259 Seafront Arches Renewal Programme. The bid seeks to secure significant Government investment to repair and renew 38 seafront arches supporting Kings Road, a critical transport corridor and strategic asset for the city. Consultant advice indicates that a local contribution of around 10% would significantly strengthen the competitiveness of the bid compared with lower contributions.

1.2 Approval would enable the council to maximise the opportunity to secure up to £37 million of external funding for essential infrastructure works which would otherwise be extremely challenging to fund locally, while helping to protect the long-term resilience of the A259 and supporting the city's economy, transport network and regeneration ambitions.

2. Recommendations

2.1 Cabinet notes that, due to the Department for Transport (DfT) Structures Fund submission deadline of 3 August 2026, a bid was submitted for Phases 6 and 7 of the A259 Seafront Arches Renewal Programme (see Appendix 1) on the basis that any proposed council contribution and participation in the scheme would be subject to subsequent Cabinet approval and the council's formal governance processes.

2.2 Cabinet agrees the inclusion of a £4 million Brighton & Hove City Council contribution within the Structures Fund bid, recognising that this contribution forms part of a funding request for a scheme with an estimated total value of approximately £41 million**.**

2.3 Cabinet notes that inclusion of a £4 million contribution within the bid does not constitute a legally binding commitment to proceed with the scheme or incur expenditure at this stage.

2.4 Cabinet delegates authority to the Corporate Director City Services, in consultation with the Cabinet Member for Transport & City Infrastructure and the Chief Finance Officer, to undertake all necessary actions in relation to the submitted Structures Fund bid.

3. Context and background information

3.1 The Department for Transport's £1 billion Structures Fund presented a rare and time-limited opportunity for the council to secure substantial external investment towards the renewal of the A259 Seafront Arches, a critical asset supporting Kings Road and the wider transport network. The submission deadline required the council to submit a bid before Cabinet could be convened to consider the matter formally.

3.2 The bid was therefore submitted on the basis that any proposed local contribution would remain subject to Cabinet approval and the council's normal governance processes. This approach ensured that Brighton & Hove City Council did not miss the opportunity to compete for up to £37 million of Government funding (with further £4m contribution from the Council towards the £41m) whilst retaining full control over any future decision to proceed.

3.3 The Deadline by which Local Highway Authorities need to submit final submission template and economic toolkit (Background Document)) was the 3rd August 2026. The DfT will make the announcement on funding awards in Autumn 2026. Following the announcement of the award, the officers will return to cabinet with a request for approval to proceed to design and continuation to the construction phase, with a more detailed understanding of the financial implications that the scheme will have for the Council.

3.4 Advice received from the council's specialist consultants indicates that a local contribution of approximately £4 million would significantly strengthen the competitiveness of the bid compared with lower contribution levels, particularly given the scale of the proposed £41 million scheme and the expected level of national competition for funding.

3.5 Approval of the £4 million contribution at this stage supports the council's funding submission and demonstrates a meaningful local commitment to the programme. However, it does not bind the council to proceed with the scheme. The council can ask to withdraw from the proposed funding arrangement ahead of any announcement.

3.6 The estimated costs for Phases 6 and 7 have been informed by the successful delivery of previous phases of the Seafront Arches Renewal Programme, providing a robust evidence base for forecasting future costs and programme requirements.

3.7 The costing model required by the DfT is to conform to the HM Treasury Green Book. The Green Book requires the submission of Whole-LIFE Costs. These include the capital costs (design, construction, fees, compensation to land and property owners (where applicable), risk and optimism bias), operating costs, maintenance costs for the life of the asset, renewal and replacement costs, and end-of-life costs.

3.8 Cost estimates have been developed using current market rates and include allowances for inflation over the expected delivery period. In addition, appropriate risk and contingency provisions have been incorporated to reflect the complexity of working within a live highway environment, potential ground and structural unknowns, utility diversions, compensation for tenants and property owners to vacate their premises for the works period and wider construction market volatility. The council's consultants are satisfied that the estimates represent a prudent and realistic assessment of the likely scheme costs based on experience from earlier phases and current industry conditions.

3.9 To meet the time constraints outlined by the DfT the project needs to be open to traffic by 31st March 2030 a high level programme has been developed to allow for the completion of the structural work by this date.

3.10 The wider programme of works is intended to ensure the continued structural integrity of the arches that support Kings Road and the A259, a critical transport corridor for the city. Renewal of the arches will help maintain the safety of road users, pedestrians, cyclists and public transport services by safeguarding the infrastructure that supports the highway above. Any associated work such as temporary traffic measures and road restrictions will be considered if and when the bid is approved.

3.11 The programme will also enable the continued safe occupation and commercial use of the arches beneath the highway, supporting businesses, employment, tourism and leisure activities along the seafront. By addressing deterioration within the structures, the scheme will reduce long-term health and safety risks associated with ageing infrastructure while improving the resilience, safety and economic vitality of this important part of the city.

4. Analysis and consideration of alternative options

4.1 The recommended option is to support the inclusion of a £4 million council contribution within the Structures Fund bid. This level of contribution represents approximately 10% of the overall scheme cost and, based on advice from the council's specialist consultants, is expected to improve the competitiveness of the bid when compared with lower levels of local contribution.

4.2 An option of submitting the bid with a lower council contribution was considered. While this would reduce the council's potential future financial commitment, consultant feedback indicated that lower levels of match funding could materially weaken the bid in what is anticipated to be a highly competitive national funding programme. As a result, this option is not recommended.

4.3 An option of making no local contribution was also considered. This would minimise financial exposure but would significantly reduce the likelihood of securing Government funding and could result in the council missing a rare opportunity to attract substantial external investment for essential infrastructure renewal works. This option is therefore not recommended.

4.4 A further option would have been not to submit a bid. Given the limited timescale available following the announcement of the fund and the absence of any indication that a similar opportunity will be available in the future, this option was not considered in the city's best interests. Failure to submit a bid would leave the council with full future liability for maintaining and renewing the arches without the benefit of significant Government support.

5. Community engagement and consultation

5.1 The bid relates to an application for external funding and does not constitute a decision to commence construction works.

5.2 Relevant officers, the Cabinet Member for Transport and City Infrastructure, finance officers and have been consulted as part of the preparation of the bid and this report. If funding is secured, detailed engagement and consultation with businesses, residents, stakeholders and ward members will be undertaken as part of the development, design and delivery phases of the programme.

5.3 The Sussex and Brighton Strategic Authority (Appendix 3) and Transport for South-East (Appendix 4) have both provided letters of support for the scheme.

6. Financial implications

6.1 The report seeks approval to include a £4 million council contribution in the bid to the Department for Transport’s Structures Fund. At this stage the request does not create an expenditure commitment or seek budget approval at this stage. The proposed contribution is intended to demonstrate local commitment and strengthen the council’s prospects of securing external funding.

6.2 If the bid is successful, a detailed business case, funding strategy and capital financing arrangements will be required before any expenditure is committed. Approval of funds will need to approved in line with the Financial Regulations including a Cabinet report with full implications on the council’s MTFP set out. The business case will be required to demonstrate sensitivity analysis with particular focus on the implications of cost overruns and how

this would be funded and to what extent the council is at risk of further financial commitments.

6.3 The proposal could secure up to £37 million of external funding for infrastructure works that could otherwise place significant pressure on future capital resources if the project were deemed essential and to proceed without grant funding.

Name of finance officer consulted: Craig Garoghan Date consulted :14/08/2026

7. Legal implications

7.1 The Council is the Local Highway Authority for the A259 Kings Road and has powers and duties under the Highways Act 1980 in relation to the maintenance and improvement of the highway and supporting structures. The seafront arches form part of infrastructure supporting the highway and are therefore of importance to the Council's highways functions.

7.2 Delivery of any works would likely require the exercise of highways and traffic management powers and appropriate statutory procedures would need to be followed, including for temporary traffic measures and road restrictions. It is understood that the delivery of the works will likely impact businesses in the arches beneath the highway. Should the Council's bid for funding be successful, in designing the programme of works, there will be a need for the Council to carefully consider the risks around delivery, including the impact of the works and to ensure that appropriate arrangements are put in place with these businesses to enable the works to take place within the required time frames of the grant. This is likely to engage the Council's powers as highways authority, landlord and landowner.

7.3 Should the bid be successful, any acceptance of grant funding would be subject to further legal review and approval in accordance with the council's Constitution, Contract Standing Orders and Financial Regulations.

7.4 Cabinet should have regard to its fiduciary duty to council taxpayers when considering any future financial commitment associated with the project.

Name of lawyer consulted: Siobhan Fry and Katie Kam Date consulted: 10/08/26

8. Risk implications

8.1 There is a risk that the Structures Fund bid is unsuccessful, in which case the council would not secure external funding and would need to consider alternative approaches to maintaining and renewing the arches over the longer term.

8.2 There is a financial risk associated with proposing a £4 million council contribution. However, no binding financial commitment is created through

this recommendation and any future expenditure would be subject to a separate business case and affordability assessment.

8.3 There is a risk that failure to approve the proposed contribution could weaken the competitiveness of the bid and reduce the probability of securing external funding. This may increase the future burden on council resources and reduce opportunities to address a significant infrastructure liability.

8.4 Failure to invest in and maintain key infrastructure assets could contribute to strategic risks relating to financial sustainability, climate resilience and the maintenance of a clean and safe city. The proposals in this report help mitigate those risks by seeking external investment to improve the condition and resilience of a critical transport asset.

9. Equalities implications

9.1 No direct equality impacts arise from the recommendations within this report, which relate solely to the inclusion of a proposed contribution within a funding bid.

9.2 If funding is secured, an Equality Impact Assessment will be undertaken as part of the development of the scheme to consider impacts on protected groups, accessibility, businesses, residents and visitors.

9.3 Renewal of the arches would help maintain the integrity of the highway above and support continued access to transport infrastructure used by all communities across the city.

10. Sustainability implications

10.1 The A259 is a critical transport corridor and strategic asset for the city. Investment in renewing deteriorating infrastructure supports the long-term resilience and sustainability of the transport network.

10.2 The proposals contribute to adaptation and resilience objectives by protecting infrastructure from further deterioration and the impacts of coastal weather conditions. This aligns with the council's broader objectives of maintaining infrastructure resilience and supporting the transition to a sustainable city.

11. Health and Wellbeing Implications:

11.1 The recommendations do not have any immediate health and wellbeing implications. However, maintaining and renewing critical infrastructure contributes to public safety and supports continued access across the city.

11.2 If the programme proceeds, construction impacts and mitigation measures will be considered through future project development and delivery arrangements.

12. Conclusion

12.1 The Department for Transport's Structures Fund represents a rare opportunity to secure substantial Government investment towards the renewal of the A259 Seafront Arches. The recommended £4 million council contribution would strengthen the competitiveness of the bid while not creating any binding commitment to proceed at this stage.

12.2 Approval of the recommendations will maximise the opportunity to secure up to £37 million of external funding, support the long-term resilience of a critical transport asset, reduce pressure on future council resources and help protect the city's economy, seafront and transport network. Cabinet is therefore recommended to approve the proposals set out in this report.

Supporting Documentation

1. Appendices

1. Structures Fund submission
2. SBSA letter of Support
3. TfSE letter of Support

Background Document

1. Brighton Economic Tool Kings Arches

Department for Transport

Structures Fund template

This template is for local authorities proposing schemes for investment from the Structures Fund. Before completing the template, local authorities should read the Structures Fund guidance and associated documents. Alongside the template, local authorities must also complete the economic toolkit for the proposed scheme.

Part 1 – Details of the Structure Being Promoted

1.1 Scheme Information

This section captures the key information on the scheme that is being proposed to the Structures Fund.

a) Local highway authority (LHA) name: Brighton & Hove City Council

b) Scheme / structure name and LHA bridges number: A259 Seafront Arches Phase 6 and 7

c) Location (OS Grid Reference) of the scheme/structure (to identify location on map):

Easting: 530822

Northing: 103951

d) Name of Project Manager: Nick Bean

e) Email address: nick.bean@brighton-hove.gov.uk

f) Phone number: 07769908081

g) What type of eligible structure would your scheme address? (select all that apply)

☒	Bridges	☐	Cutting/embankment
☐	Fly-overs	☐	Tunnels
☐	Retaining walls	☐	Local highway repairs due to landslip
☐	Culverts	☐	Local highway repairs due to collapse
☐	Other structure type (please specify): Click or tap here to enter text.		

h) Provide an overview of the structure proposed for intervention and the nature of the problem. (Maximum 250 words)

This could include, for example, the age, construction type, feature carried and feature crossed of the relevant structure and if the structure has listed heritage status.

The A259 Kings Road is a major arterial route passing along the seafront at Brighton. The route is of vital importance to the highway network and to the economic health of the area. This main road is supported by Victorian arches which are approaching the end of their useful life and are in urgent need of replacement to avoid collapse and the closure of the road which would bring

severe negative impacts for transport, the economy and employment as well as affecting tourism and impacting negatively on the environment. Health & Safety incidents over the last 20 years include partial collapse of sections directly above arches causing major disruptions and the Council is committed to monitoring, managing and acting where necessary to temporary negate further likely incidents. This includes programming major works in phases.

Earlier phases of the arches have been planned to be renewed, having found to be in a very poor structural condition following structural surveys and inspections in line with DMRB Management of Highway Structures Code of Practice.

The 38 Arches in this application scheme were built at the same time and exhibit similar issues as confirmed by structural surveys carried out in June 2026. As with earlier phases, the imminent health and safety risk of failure requires urgent attention, the conclusion of the assessments is that if no action is taken to address the critical state of the structures it would be necessary to close the westbound carriageway of the A259 and adjacent cycleway.

i) Provide an overview of the proposed intervention and how the works will address the problem.

This should set out the method of resolving the issue that is to be addressed.

The proposed scheme to reconstruct the seafront arches will provide a stable highway structure for the long term, maintaining the existing provision for pedestrians, cycles and vehicle traffic.

The scheme will ensure the continued economic growth of the city and enable key strategic developments to be realised. The arch strengthening will provide for a 120-year life extension of the structure and enable weak structures that also house businesses within the space / voids fronting the Lower Promenade to be refurbished and continue to provide commercial floorspace and other opportunities that will generate additional economic activity and revenue and help further regenerate the area.

The carriageway, cycle lane (National Cycle Route) and footway of the A259 will be able to continue to perform their strategic function for vehicle and people movements approaching the city centre. The failure of the structures could significantly affect east-west movements and therefore severely impact on journey times and increase the cost of some journeys.

The failure of the structures supporting the highway would necessitate diversion of vehicle traffic, adding to congestion on the alternative routes with a consequential reduction in air quality locally and on a city wide basis; the proposed works will prevent this.

j) Is any part of the relevant structure owned by a third-party (e.g. the Canal and River Trust or Network Rail)?

Within the proposed scheme the majority of the 38 arches are in direct ownership of Brighton & Hove City Council; however, there are 12 arch structures privately owned by 5 separate owners. The Council has been in discussions with the private owners, and they are supportive of the scheme and works proposals; as they benefit all parties by removing the risk of structurally deficient areas of the seafront arches and replacing them with fit for purpose structures. The owners are also fully aware off the powers the Council has under the Highways Act and therefore keen to work in partnership with the Highway Authority. In the past arch owners have collaborated and worked with the council when structural issues affecting their occupancy or ownership have needed to be addressed. The Council has already started the process of investigating occupancy freehold title in respect of demised space.

k) If the structure is on a diversion route for the SRN provide a clear description/commentary.

The structure is on the MRN, performing a crucial role for both local and strategic traffic movement. The A27 north of Brighton is part of the SRN. If the structures failed there would be additional pressure on other parts of the MRN and the SRN created by the diversion of traffic.

1.2 Understanding the Condition of the Structure

Please set out the current condition of the structure in this section.

a) Provide evidence that the relevant structure is in need of repair either now or by the end of the 2029/30 financial year. (Maximum 250 words)

Provide details of the process used for determining whether this structure is in need of repair and the timescale in which the repair is needed..

Structural Assessment and Principal Inspections carried out since 2009 identified defects including cracking in the roof slabs of other seafront arches built at the same time. BHCC started the Arches Renewal Programme in 2015 which include the i360 and Shelter Hall. Works on Phase 4-5 are planned to start in 2026. Inspections (June 2026) confirm the poor condition of arches in Phases 6-7, which identified areas presenting evidence of deterioration including:

- Cracking and localised spalling
- Minor areas of corrosion to steel joists
- Water ingress, staining and seepage
- Paint flaking and deterioration of finishes
- Other water-related defects to elements supporting or immediately below the deck

Extensive areas of the filler joist slab deck soffits were concealed by paint, cladding and suspended finishes, which may have obscured evidence of deterioration. Consequently, the condition of all deck soffits could not be fully verified, although the defects observed are considered representative of the exposed areas inspected. In addition, sampling and assessment of previous completed works at the demolition stage has shown the urgent need for replacement. There is no evidence from this most recent survey to alter the previous conclusions and recommendations relating to the need to replace the existing filler joist slab decks.

The observed condition of the exposed filler joist slab soffits, together with the previously completed structural assessments, supports the continued recommendation that all existing filler joist slab decks need to be replaced. June 2026 condition survey and the latest BCI scores are attached.

b) Please indicate if the relevant structure is **currently** subject to traffic restriction as a result of its condition.

Reference should be made to closures, weight limits, width restriction, limits on use.

There is no vehicle traffic restriction but the handrails on the upper promenade are too low for modern standards and following several Health and Safety incidents and near miss reports from the public barriers have been installed to mitigate the high risk of people falling from height. This has restricted access in parts for pedestrians and cyclists along the length of the scheme.

c) Please indicate if the relevant structure is **not currently** but **by the end of the 2029/2030 Financial Year is expected** to be subject to traffic restriction as a result of its condition.

Reference should be made to closures, weight limits, width restriction, limits on use that are anticipated.

Earlier phases of the Arches Renewal Programme are structurally deficient and have needed propping to maintain their integrity and access to the public. As Phases 6-7 were built at the same time and have been exposed to similar sea front conditions all evidence and on-going inspections indicate the need to carry out urgent repairs to prevent a major incident and road closure. In the event collapse or partial failure occurred there would be a danger to life and impact on the travelling public, businesses, pedestrian's and cyclist due to traffic restrictions and diversions.

Closure of an adjacent section of A259 in 2012 and 2014 because of structural failure of the supporting arches lead to significant delays to traffic and the knock-on negative effects to business and tourism in the area for around 12 months while a localised repair was put in place.

d) If the answer to c) above is yes, then please estimate the likelihood of this occurring: (select box that applies):

☐ Low confidence in restriction occurring
☐ Medium confidence in restriction occurring
☒ High confidence in restriction occurring

e) Please indicate if the relevant structure is **currently** subject to other temporary measures to manage risk.

Reference should be made to measures such as propping, etc.

The handrails on the upper promenade are too low for modern standards and there is a high risk of people falling over these, as such they are barriered off which restricts the space for pedestrians and cyclists along the length of the scheme. The proposed scheme would replace these to modern standards, improving safety and enabling the safe use of the upper promenade. This is currently a specific health and safety concern for pedestrians and cyclist as the handrails protect against a fall of around 6 meters.

f) Please indicate if the relevant structure is **not currently** but **expected by the end of the 2029/2030 Financial Year** to be subject to temporary measures to manage risk.

Reference should be made to measures such as propping, etc. that is anticipated.

As described above, there have been incidents within similar adjacent arches that have required temporary measures to manage risk, such as propping. The recent inspections show clearly that the condition of the structure is at high risk and will require significant measures by the end of 2029/30 FY. In 2014 a partial collapse of the A259 occurred when work to an arch caused a support failure. This resulted in part lane closure and extensive emergency shoring and complex rebuilding of the weakened structural areas were completed by early 2015.

As a result, there has been an increase in health and safety concerns along this stretch of the A259 which are monitored on an ongoing basis as well as the normal yearly inspections. Regular contact with the occupiers and the highlighting of increased observations (like water ingress or increased cracking) have already resulted in some temporary measures. This has included within the last two

years the introduction of steel support beams to two of the arches.

g) If the answer to f) above is yes, then estimate the likelihood of this occurring:

☐ Low confidence in temporary measures being required
☐ Medium confidence in temporary measures being required
☒ High confidence in temporary measures being required

h) If available and applicable, what is the current Bridge Condition Indicator score (average and critical) of the relevant structure?

BCI Crit: There are four sections to the structures with BCI Critical scores these are BS.5619= 9.72 BS.5620=55.48, BS.5621=31.00, BS.5622=21.12

BCI Ave: There are four sections to the structures with BCI Average scores these are BS.5619= 87.99, BS.5620=84.12, BS.5621=79.04, BS.5622=87.90

i) Which elements of the structure are negatively contributing to the BCI scores and how has this changed in the last 5 years.

Reference should be made to recent inspections and highlight the type and extent of the defects.

Principal inspections are undertaken every six years and general inspections undertaken every year. The most recent Principal Inspection has been undertaken in June 2026. The major concern and risk areas are to the southern parts of the structures whereby the highway is supported on circa 1880 filler beam slabs and deteriorated brick piers. These exhibit cracking and spalling throughout. Due to the filler beam slabs being constructed of unreinforced concrete with cast in steel beams spanning in one direction its failure mechanism is in shear which is sudden and catastrophic. The load carrying capacity is of the filler beam section of the structure is 5KN/m2 which is far less than recommended 40T AWL for aspects of a highway structure that run adjacent to the highway. The kerb line has been moved in the past to protect the filler beam slabs and a pedestrian barrier mounted along the kerb line, which gives some additional protection but this does not constitute a vehicle restraint system as due to historic, conservation and large pedestrian movements a VRS is not feasible along Brighton seafront. It is intended to replace the substandard and at risk structural areas with new compliant reinforced concrete frames, slabs and foundations; that are fit for purpose and safe for use. The overall structural condition continues to deteriorate year on year, and the works are designed to arrest this and provide new areas that comply with modern highway loading criteria.

j) Submit, alongside this submission template, the most recent, dated copy of the structural inspection proforma or a report summarising this.

Part 2 – Understanding the Case for Investment

2.1 Strategic Case

This section of the template captures the wider need for the scheme and how it aligns to the objectives of the Structures Fund.

a) Provide a summary of how this scheme contributes to the Government's economic growth mission (Maximum 250 words)

Describe how the proposal will support economic growth (e.g. by creating jobs, attracting investment, improving productivity, or enabling new business activity) and set out the mechanisms through which these benefits will be delivered.

The arches repair aligns with policy at all levels and will provide a positive difference to the area, enhancing access and economy for all users. The new arches will support GROWTH by providing improved commercial spaces within the arches that are safe to use and fit for purpose, creating jobs and attracting investment. The current employment within the affected arches is circa 152 and this is likely to increase following the works.

The arches will safely support a key part of the transport network which enables delivery of new housing, commercial and leisure developments including King Alfred (leisure centre and housing) Black Rock (conference centre), Brighton Marina (new homes) and Waterfront (commercial, retail and housing). CLEANER ENERGY would be met by ensuring the future of a much improved link for active travel, avoiding significant diversion and potential increase in vehicle trips on the surrounding network. HEALTHIER AND SAFER STREETS would be provided by enabling active travel journeys, avoiding the negative effects of traffic diverting through the City which would increase emissions and congestion whilst negatively impacting safety. BREAKING DOWN BARRIERS as it supports travel routes to schools, employment and local facilities. The improved structures will meet current design standards which open up the area for active travel journeys and maintain the important link for all users along the corridor.

b) Explain how the scheme supports other Government policy objectives. (Maximum 250 words)

Provide a summary of the scheme's alignment to UK Government policy objectives as represented by the remaining missions.

NPPF includes objectives, which the proposed bridge will support

▪ Economic: to help build a strong, responsive and competitive economy…

o The strengthened arches will support the economy of the local and wider area, by providing modern usable commercial space within the arches and keeping the main seafront road open to enable movement by all modes for the benefit of the wider economy.

Social: to support strong, vibrant and healthy communities…

o The strengthened arches are vital for access to local attractions including the beach and seafront open spaces as well as supporting the growth of strong and healthy communities by providing high quality cycle and pedestrian facilities which would be closed if the arches fail.

Environmental: to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy

o The strengthened arches will improve active travel by providing safe pedestrian and cycle routes, minimising pollution and helping moves to a low carbon economy, reducing emissions through reduced reliance on private car travel. The arches are an iconic part of the historic

environment in Brighton, they are designated heritage assets and the proposal will enhance historic environment and make effective use of the spaces within to provide enhanced commercial space, built to modern standards

c) Explain why this scheme is a local priority. (Maximum 250 words)

Provide a summary of the scheme's alignment to local priorities and policies.

Health and Safety is a priority and repairing the structures will provide a new asset that is safe and fit for purpose, delivering fresh commercial space creating additional business opportunities that will generate additional economic activities and revenue resulting in regeneration of this area. The scheme brings significant economic benefits and employment opportunities the City.

The Council's Sustainable Transport Strategy as set out in the local Transport Plan includes several aims which would be met by this scheme including; reducing danger for all road users, improving accessibility for environmentally friendly transport, reducing road traffic, pollution and congestion within and around the city, promote and improve the economic environmental and social viability of the city.

Kings Road (A259) is the main strategically and locally important transport link running the entire length of Brighton's seafront, it carried more than 26,00 vehicle per day and provides a crucial cycle link as part of National Cycle Route 2.

BHCC recently completed LUF funded Kingsway to the Sea. Enabling access to these new facilities and improved area by strengthening the arches is essential in achieving the full potential of the LUF scheme.

Redevelopment of King Alfred Site is progressing, providing a new leisure facility and residential development. Arches replacement is vital for access to by all modes.

Key city opportunity areas / development sites, referenced in the City Plan Parts 1 and 2, including The Waterfront, Black Rock sites, rely on the continued operation of the A259.

d) Summarise engagement with local stakeholders, any joint-owners, levels of support for the scheme and explain any controversial elements. (Maximum 250 words).

Summarise support from relevant stakeholders such as the Local MP, Elected Members relevant combined authorities, National Highways, Network Rail, neighbouring LHAs, or important utility providers.

The scheme is very well supported, forming part of the wider arches renewal programme which has brought significant improvement to the area.

The arches are heritage assets and therefore irreplaceable, therefore the design of these structures requires detailed engagement with conservation officers, planning officers and Historic England as has taken place on the earlier phases. Regular meetings are held with Stakeholders, such as the Seafront and Property Management Teams to accommodate the current and future business needs within the structures. Transport Planning, Highways and Structures teams to ensure an environment that is safe and fit for purpose. Discussions have also been held with local amenity and conservation groups such as CAG and the Regency Society.

e) Provide a summary of the local approach to prioritisation of structural maintenance work. (Maximum 250 words)

Set out any weighting, scoring or other methodology which explains why this scheme has not been subject to work prior to this point.

The majority of the seafront structures that support the highway along the A259 are over 130 years old. We have a programme of replacement of defective and end of survivable life highway structures. The replacement structure programme started with the most serve and at risk areas which may cause harm to the public and transportation. Therefore all available funding has been exhausted due to being expended on previous phases of works. Due to budgetary constraints, it is impossible to undertake the critical replacement and strengthening works needed going forward on the current identified works without external funding. This current phase of works which forms part of a multi year programme is now the next priority for replacement and strengthening.

f) Provide a summary of why this scheme has been selected for this application to the Structures Fund. (Maximum 250 words)

Provide a brief summary of the specific need for this structure is advanced to the Structures Fund.

Structural Assessment and Principal Inspections carried out since 2009 identified defects including cracking in the roof slabs of other seafront arches built at the same time. BHCC started the Arches Renewal Programme which has already seen the improvement of Phases 1-3 which include the i360 and Shelter Hall. Works on Phase 4-5 are planned to start in 2026. Recent inspections (June 2026) confirm the poor condition of arches in Phases 6-7, the subject of this bid, and the need to continue the renewal programme. With knowledge and experience of the arches from earlier phases, the scheme can be delivered by 2030.

The conclusion of the assessments by structural engineers is that the arches need to be addressed as soon as possible to avoid structural failure. Continued degradation will result in continued reduction of structural capacity. Current condition and degradation trends indicate it is highly likely these structures will be deemed unsafe by 2030. It is anticipated that within 3 years these arches will be unusable, requiring significant propping and therefore tenants removed from the arches.

The scheme complements other recent / proposed projects in the area to maintain and enhance the transport link and economic vitality of the City's seafront. The scheme fits within the City Council LTP.

The wider programme of works entails ensuring the integrity of the road support and safety of road user, as well as the enabling commercial use of the arches with installation of shops and other tourist and retail establishments under the road structure.

g) Summarise the impacts of not delivering this scheme (Maximum 250 words).

The response should consider the impact of not delivering the scheme, such as community severance, lengthy diversion routes or impacts on other infrastructure.

Failure of the arches will result in closures of the A259 having significant impact on access to an important area of the city.

Traffic diverted on to lengthy diversion routes for extended periods will adversely affect traffic conditions, air quality and result in increased collision risk on less suitable more congested routes causing community severance.

Loss of key active travel facilities if existing structures become unviable - increased traffic and/or pedestrians and cycles on less suitable routes will have wider implications on road safety, air quality and health.

Failure to protect the A259 link would have a significant negative impact on the city, acting as a deterrent to business and visitors alike. The implications of this would be long lasting and not just restricted to periods of forced closures.

The failure of these arches and subsequent closure of sections of the seafront would undermine the investments already made, delaying maintenance will ultimately cost more money due to the failure of the arches and subsequent knock-on negative effects to the movement of people, traffic and the economy. These links are by all modes with not only vehicular connections along the south coast and to the central car parks but also National Cycle Network Route 2 and a wide pedestrian area.

h) If applicable, explain how the scheme helps prevent the likelihood of community severance for all transport modes and the impact that this severance would have or already has. (Maximum 250 words)

Answers should explain the impact on connecting local people to facilities, services, employment, education and local communities. The response should also summarise the extent of diversions for communities, which modes are impacted and how. Applicants may wish to use the guidance in TAG A4-4 Social Impact Appraisal.

The diverted traffic resulting from westbound traffic lane closure will cause a moderate to severe level of severance for pedestrians and people along the diversion routes which affect an area home to more than 100,000 residents.

The diverted traffic will increase noise, road danger and pollution on the diversion routes making pedestrian journeys much less attractive and in some areas a considerable hinderance. The closure of the southern footway of A259 will increase journey distance for pedestrians, making walking trips less attractive or potentially unviable, leading to moderate or severe impacts.

National Cycle Network Route 2 runs along the seafront providing an incredibly valuable link for all manner of cyclists, including; family / leisure, tourists, local and long distance commuters.

Maintaining this link would not only provide for these users; if the structures failed, the subsequent diversion of traffic would not only have negative consequences on the movement of traffic but would increase conflict between traffic and other users on the diversion routes within other areas of the city.

It is likely that the closure of the cycle route would deter many cyclists from making their journeys on routes without high quality cycle infrastructure, this would result in severe severance impacts.

The severance would be experienced locally and city wide, affecting trips to leisure and tourism on the seafront, shopping and employment in the centre, school and commuting in the wider area.

i) Summarise the volumes of traffic by mode that are impacted as a result of any community severance (Maximum 250 words).

Explain the impacts on non-motorised and motorised traffic flow. Describe how diversions may differ by mode.

2024 data show 11,922 motorised vehicles travel westbound on A259 (24hr AADT). The cycle

route carries 1,466 cycles, all of whom would be affected by the structure failing and the closure of the westbound traffic lane and cycle route. The area has very high footfall though no data is readily available, a high number of pedestrians would be impacted by the failure of the structures.

Diversion routes were identified in the FBC for Phases 4-5. These will apply to Phases 6-7 and traffic flows have been applied to these based on journey distance; local (<2miles), through traffic (<10miles + 50% of trips >10miles) and strategic routes (remaining 50% of trips >10miles).

The diversion for cyclists would result in an additional 0.55km, they would be diverted to areas where there are no dedicated cycle facilities, which would increase the risk of cycle related accidents.

The structures are centrally located within the City seafront area, meaning the diverted traffic would pass through densely populated areas. The local and through traffic diversion routes would impact on a higher number of people, being home to over 100,000 people (Census 2021). Traffic on the strategic diversion would impact areas where there is a higher proportion of people over 65 years old and a higher proportion of households with some degree of deprivation.

Being central also means significant number of tourists and workers would also be affected.

The scheme supports the Council's BSIP ambitions by ensuring nearby high frequency corridors are not affected by diverted traffic

2.2 Economic Case

This section sets out the assessment for Value for Money of the project. Applications must use the provided economic toolkit, but if alternative methods have also been used to support the economic case, this section provides the opportunity for the results to be reported.

a) Set out the key sources for the economic benefits (e.g. journey-time savings, carbon, etc.) of the scheme. (Maximum 250 words)

Describe the main benefits the scheme is expected to deliver.

Key sources for economic benefits come from journey time savings, congestion reduction and will include values for carbon in the final submission. Improvements to the road network, pedestrian pathways and accessibility to the lower promenade have already been proven (previous phases) in terms of transforming this area of the sea front into a vibrant, family friendly and inclusive space. The transformation over the last 15 years has raised the quality of the urban environment, increased sociable footfall and improved business trading and rental income for the council. Phases 6 & 7 will not only address the health and safety concerns urgently required but improve the network, employment, social cohesion with greater accessibility for all.

b) Summarise the estimate of the present value of costs and benefits (in 2023 present values, market prices) and the benefit cost ratio of the scheme from the economic toolkit.

Present Value Costs (PVC)	41,841,771
Present Value Benefits (PVB)	804,526,799
Benefit to Cost Ratio (BCR)	19.2

c) Explain assumptions used in the economic toolkit to estimate the present value scheme costs. (Maximum 250 words)

Describe the basis of the costs input to the economic toolkit and provide justification for the risk and optimism bias values that have been used.

The costs included within the economic toolkit have been derived from benchmark rates based on the tendered construction costs for Kings Road Arches Phases 4 and 5, the closest comparable schemes within the wider regeneration programme. Tendered costs were converted into composite rates (£/m²) and applied to the proposed footprint areas of Phases 6 and 7 based on the anticipated scale and complexity of the works.

A 10% construction risk allowance has been included to account for the current level of project definition and potential scope development, design complexity, unforeseen structural repairs and other construction-related risks.

As construction is anticipated during 2028/29 to 2029/30, a 15% construction inflation allowance has been applied to reflect forecast increases in labour, plant, material and contractor costs.

Allowances for professional fees, surveys, statutory undertaker works, tenant compensation and other project-related costs have been based on standard percentage allowances informed by previous phases of the Kings Road Arches programme.

An optimism bias of 25% has been applied to reflect the early stage of project development. Whilst lower than typically applied at this stage, it reflects the greater level of certainty provided by previous phases, including a detailed understanding of likely costs, design requirements, structural interventions and delivery constraints. However, as no detailed design or intrusive investigations have yet been undertaken, a residual level of uncertainty remains.

d) Explain the sources of data and assumptions used to complete the Scheme Details section of the economic toolkit. (Maximum 250 words)

Provide details of the source of all data and associated assumptions (e.g. provenance, data checks, etc).

Data from BHCC's permanent traffic counters has been used to understand traffic flows and the volume of diverted traffic using 2024 data.

The diversion routes follow an accepted approach used for earlier phases of the Arches Renewal, that considered three diversion routes based on journey type (local traffic, through traffic and strategic traffic). The medium length, through traffic, diversion route has been used in the appraisal tool as it captures the largest share of diverted trips.

e) Describe significant non-monetised impacts of the scheme. (Maximum 250 words)

Consider any economic, environmental and social impacts that have not been monetised to fully describe the impacts of delivering the scheme.

The scheme will ensure the continued economic growth of the city and enable key strategic developments to be realised. The arch strengthening will provide for a 120-year life extension of the structure and enable weak structures that also house businesses within the space/voids fronting the Lower Promenade to be refurbished and continue to provide commercial floorspace and other opportunities that will generate additional economic activity and revenue and help further regenerate the area.

These works will ensure the condition of these structures will be maintained for the next 120 years and therefore the carriageway, cycle lane (National Cycle Route) and footway of the A259 will be able to continue to perform their strategic function for vehicle and people movements approaching the city centre. The failure of the structures could significantly affect east-west movements and therefore severely impact on journey times and increase the cost of some journeys.

The works will provide opportunities to improve the public realm and further add to the attractiveness of the seafront, by reducing severance and increasing connectivity between the promenade and the Waterfront site and the city centre, in addition to decluttering and improving street furniture.

The strengthening of the city's seafront structures that are active (approximately a 2.5 km section) will also help the regeneration of the more rundown parts of the seafront. Wherever possible, works will maximise the internal areas to be brought into use (or be upgraded) as commercial premises which will add vitality, activity and new business opportunities to this location.

f) Where an alternative economic assessment has been undertaken to support a case for investment, please summarise the data used, the assumptions made and the results obtained (in 2023 present values, market prices). (Maximum 250 words)

Some schemes may have been subject to economic assessment to support previous cases for investment. Summarise the key details of these here, including details of the data, assumptions and results (e.g. present value of costs and benefits and benefit cost ratio).

Click or tap here to enter text.

Present Value Costs (PVC)	Click or tap here to enter text.
Present Value Benefits (PVB)	Click or tap here to enter text.
Benefit to Cost Ratio (BCR)	Click or tap here to enter text.

To enable the assessment of the economic case, please submit the supporting information listed below to StructuresFundTAB@dft.gov.uk

- Economic Toolkit
- Any supplementary reports which support the economic case

2.3 Commercial Case

This section captures information on the commercial viability and procurement strategy for the planning and delivery of the scheme being promoted.

a) Explain the LHA capacity and experience delivering comparable schemes. (Maximum 250 words)

Where capacity is challenging for local authorities, explain how any capacity gaps may be addressed to ensure delivery of the scheme.

BHCC have successfully delivered earlier phases of the arches strengthening programme. The Council has a well-established management and governance arrangement for delivering major projects, including the reconstruction of Shelter Hall, seafront arches and Valley Gardens. The team has extensive expertise for delivering comparable schemes and an ongoing, long-term relationship with consultants who have assisted with delivery of these major projects and would be on hand to support this scheme if needed. The proposed team and governance structure are appended.

It is worth noting that the redevelopment of the now award-winning Shelter Hall (2016/17/18) and associated strengthening works to the highway structure has transformed the sea front area

creating a family friendly environment and huge social value increases in accessibility, wellbeing and inclusive activities. What was considered a run-down part of the City in the early to mid 2000s has become a vibrant, friendly safe space for all. This has been driven by key works to the national road network and particularly the strengthening aspect that provides better useable space underneath the A259.

b) Explain the delivery plans and procurement strategy for the scheme. (Maximum 250 words).

This section should include explanation of the various stages of the scheme that are required for completion. This may include design, consents and construction processes.

The same strategy will be adopted as recently used for Phases 4&5, using the Hampshire County Council (HCC) GEN5 Construction Framework as the preferred procurement route for delivery. The framework provides a fully compliant, pre-procured and competitive route to market, with direct access to appropriately experienced civil engineering and public realm contractors who are capable of delivering complex coastal, structural and highways works. In selecting GEN5, the Council has also drawn upon positive experience from a previous major infrastructure project, successfully delivered under the same framework, providing confidence in contractor capability, governance processes, reporting structures and dispute-avoidance culture. Furthermore, the framework benefits from specialist commercial and technical support delivered by the HCC GEN5 team, which provides additional value through procurement assurance, application of lessons learned, dispute prevention guidance, and contract management advisory support. The selected procurement approach offers the following key advantages:

- Fully compliant public-sector framework route avoiding lengthy statutory procurement processes
- Known and proven delivery partners with coastal, structural and public realm experience
- Balanced quality and cost evaluation (50/50) supporting value for money and capability assurance
- Contract price certainty using NEC4 ECC Option A with Activity Schedule
- Clear change-management and risk-allocation model including Early Warnings and Compensation Events
- Ability to achieve programme certainty via rapid mobilisation and pre-approved supply chain
- Support from the GEN5 framework management team, strengthening delivery assurance and governance
- Alignment with previous successful BHCC major project delivery
- experience

c) Describe the delivery risks associated to the project delivery. This should include risks which may challenge the end date for the Structures Fund.

Explain what risks have been identified and how might these be mitigated.

Costs and risks under the NEC4 ECC Option A contract will be managed using NEC's collaborative risk-management principles, with clearly defined responsibilities, robust change-

control processes and ongoing commercial transparency. Under Option A, the contractor is required to deliver the works at the agreed Activity Schedule prices, subject only to change via formally instructed Compensation Events, providing a high degree of price certainty for the Council.

Risk identification, allocation and mitigation will be actively managed through Early Warning notifications, joint risk reviews and programme management, ensuring emerging risks are captured, assessed and acted upon promptly. Client-owned risks, including residual design risk, planning-related matters, statutory undertakers and third-party approvals, will be managed by BHCC with support from the Project Manager, whereas contractor-owned delivery risks associated with methodology, workmanship, temporary works, sequencing and site management will remain with the contractor.

d) Explain whether liaison with any applicable third-party organisations present a particular risk to delivery and whether those organisations have agreed to support the scheme's delivery. (Maximum 250 words)

In this section set out if the scheme requires support from other organisations, and the nature of any engagement undertaken to date.

Various occupiers / operators within the arches, including UKPN substations, who will be engaged with to secure access and support. BHCC have powers under the Highways Act to carry out the works regardless so risk will be minimised.

2.4 Financial Case

a) Provide estimated outturn costs (£million) for the scheme in the table below. The table should be completed with total costs, requested DfT investment, LHA contribution and third-party contributions. Only capital funding costs should be included in the table.

To note, the prospectus sets out that:

- schemes should be delivered by end-2029/30.
- schemes with early delivery (i.e. in 2026/27) may be prioritised.
- schemes should not be affordable from existing LA budgets.
- local contributions are required for proposed schemes.
- preference will be given to schemes with higher local contributions and/or those where there is a high percentage of local contribution.
- preference will also be given where the local contribution is:
    - not from other central government funding sources.
    - partially funded from other third-party sources.

	2026/27	2027/28	2028/29	2029/30	Total
Requested DfT investment	£	£6,213,100	£15,426,200	£15,426,200	£40,915,500
LA contribution	£	£	£	£4,000,000	£4,000,000
Other contribution	£	£	£	£	£
Total costs	£	£6,213,100	£15,426,200	£19,426,200	£41,065,500

b) Outline how the LHA has sought to manage this scheme from existing budgets and why that has been unsuccessful.

Explain the local approach to managing the existing DfT contribution across its highway assets and what specific challenges have meant that this structure was not repaired earlier.

Brighton & Hove City Council is responsible for a large number of structural highway assets. The estimated Gross Replacement Cost (GRC) of all the highway structures assets is approximately £530 million. This represents a significant number of socially inclusive assets, which are managed by the Council. Many of these assets are used on a daily basis and are fundamental to the economic, social and environmental wellbeing of the community. Keeping the city moving, growing the economy and making better use of public money are key corporate priorities for Brighton & Hove City Council.

In accordance with the 'Management of Highway Structures' Code of Practice, and ADEPT (Association of Directors of Environment, Economy, Planning and Transport), formally the CSS (County Surveyors Society) Bridge Group's report 'Funding for Bridge Management' the recommended annual maintenance allocation for structures (including arches) is 1% of the Gross Replacement Cost. This would equate to an annual maintenance allocation of approximately £5.3M per annum for all structures – the average combined revenue and capital maintenance expenditure for the last five years was approximately £350,000 per annum; this equates to 0.07% far less than the recommended amount.

c) Describe the whole life costs anticipated without the proposed scheme. Explain how the proposed scheme mitigates costs from a whole life perspective. (Maximum 250 words)

Explain maintenance considerations for maintaining the structure and compare these to the scheme cost to demonstrate the financial benefit of delivering this scheme.

At present financial resources are being used to undertake emergency repairs, propping where required, monitoring, inspections and basic increasing maintenance due to the ageing structures condition, being over 130 years old and beyond their survivable state. The Council has completed previous phases of replacement and repair and no maintenance has been required to these new replaced areas within 12 years of the first phase. It is anticipated that no meaningful maintenance should be required for the first 15 years following construction as meticulous attention is used on suitability of materials and detailing. It is considered that only small areas such as repointing and replacement of guttering being between 15 to 30 years after construction. Minor maintenance is considered appropriate between 30 – 50 years after construction. Wholesale repointing, re-waterproofing and resurfacing of the deck from years 50-75. Furthermore, it is anticipated that a number of the existing substandard structures that support the A259 will require substantial propping in future years; this is a lived experience of past phases that have now been replaced. The propping requires that all businesses contained within the structures are evicted and thus reduces the economic and social benefit of the aera. Any structural failure to the areas of the proposed scheme would require reductions in running lanes on the A259 to reduce impact and surcharge loading and thus necessitate the need for contraflows and diversions.

d) Summarise how the cost estimate for the scheme has been developed.

Set out the basis for the estimate. For example, is it based on an estimate from similar work, developed by a quantity surveyor or a contractor quotation. Describe the inflation assumptions used and the rationale for these.

The cost estimate has been developed using benchmark rates derived from the tendered construction costs for Kings Road Arches Phases 4 and 5: most recent comparable within the wider regeneration programme. The estimate has been prepared in conjunction with the project Quantity Surveyor, who has been involved in the delivery and cost management of the previous

phases of the Kings Road Arches programme. Tendered costs were converted into composite rates (£/m²) and applied to the proposed footprint areas of the Phase 6 and 7.

A 10% construction risk allowance has been included to reflect the current stage of project development and provide for potential scope evolution, design development and unforeseen construction requirements.

A 15% construction inflation allowance has been applied to reflect anticipated increases in labour, plant, material and contractor costs between the benchmark tender dates and the anticipated construction period in 2028/29 to 2029/30. This allowance has been informed by current industry forecasts for construction tender price inflation.

Allowances for professional fees, surveys, statutory undertaker works, tenant compensation and other project-related costs have been based on experience from previous phases of the Kings Road Arches programme and standard industry percentage allowances.

An optimism bias (25%) has been applied to reflect the remaining uncertainty associated with the early stage of project development. Whilst lower than typically applied at this stage, it reflects the increased level of certainty provided by previous phases of the Kings Road Arches programme and the direct use of comparable tendered cost data in developing the estimate.

e) Explain the financial risks that have been considered and factored into the estimate and what contingency is allowed for.

Explain the key risks and their impact on the cost and programme, including how these link to the overall contingency allowed for in the estimate.

The estimate includes allowances to address the principal financial risks associated with the early stage of development of Kings Road Arches Phases 6 and 7. Key risks include the potential for additional structural repairs arising from future investigations, scope changes during design development, unforeseen site conditions, utility diversions, stakeholder requirements, statutory approvals, tenant requirements and changes to construction methodology.

A 10% construction risk allowance has been included within the construction estimate to provide contingency for project-specific risks that may arise as the design develops and more detailed information becomes available. This allowance is intended to cover potential changes in scope, increased design complexity, unforeseen construction requirements and other risks that could affect the final construction cost.

In addition, a 15% construction inflation allowance has been applied to reflect the risk of increases in labour, plant, material and contractor costs between the benchmark tender dates and the anticipated construction period in 2028/29 to 2029/30.

Given that no detailed design, intrusive investigations or condition surveys have yet been undertaken, an optimism bias of 25% has also been applied to reflect the residual uncertainty associated with the overall project scope, design requirements, approvals and delivery strategy. Whilst lower than typically applied at this stage, it reflects the increased certainty provided by the delivery of previous phases of the Kings Road Arches regeneration programme.

Collectively, these allowances provide a proportionate contingency appropriate to the current level of project definition and will be reviewed as the scheme progresses and cost certainty improves.

f) Provide details of the local and other contributions, including the relevant funding sources and the certainty of whether these contributions are available. (Maximum 250 words)

Describe the various sources of funding and their availability.

The available funding sources will come from reallocation of maintenance budget which would fund construction to avoid / minimise future ongoing maintenance.

2.5 Management Case

Outlines how the project will be delivered and managed effectively.

a) Select the option which best describes the current stage of the project:

- ☐ No design, benchmarked against other schemes only
- ☒ Design concept only, no supplier yet engaged
- ☐ QS estimate / early supplier engagement, stable design

b) What is the anticipated start date for construction for the scheme?

March 2028

c) What is the anticipated end date for construction for the scheme?

March 2030

d) Summarise the approach to the management of the delivery of the scheme. This should be from the current point of development to completion.

This should include the management of resources, including the supply chain, to ensure delivery and an explanation of any evidence that provides certainty of delivery within the timescale.

In July 2013 BHCC set up the Seafront Overview and Scrutiny Panel to investigate and report the challenges the seafront faces and recommended how the council could work with stakeholders to meet those challenges. In response BHCC set up a Seafront Investment Board (SIB) that feeds into the Greater Brighton Economic Board. SIB sits every six weeks, is responsible for key decisions and is made up of senior officers chaired by the Executive Director Environment Development & Housing. BHCC's Annual Governance Statement demonstrates a sound system of governance.
Ensuring the council are responsible the delivery of the aims and objectives of the Council Plan, ensuring best value for City residents. A Project Board will be responsible for delivery of the project. This team will sit every month and report to the SIB. The Board will take responsibility for the Business Plan and achievement of outcomes, responsibility for the strategic direction and management of the programme or project. The Board is responsible for approving budgets, monitoring risks, quality and timeliness. Roles and responsibilities of the Board are: responsibility for the Business Plan and achievement of outcomes, ensure the scope aligns with the requirements of the stakeholder groups, Address issues with major implications for programme or project, Reconcile differences and resolve disputes, Take on responsibility for any corporate issues associated with the project, Identify and manage risks through the Risk Register, Understanding of programme and project management, Be committed to, and actively involved in pursuing the programme or project's outcomes,

e) Explain the key delivery risks and challenges and how the local authority intends to address them. Answers should also explain any financial risks and how any cost overruns will be addressed by the local authority. (Maximum 250 words)

Explain how key financial risks are being managed and mitigated. Explain how other risks are being managed (e.g. are there any points of complexity or requirements regarding planning or land ownership?).

THESE WILL INCLUDE THE FOLLOWING – Contractual (liquidation, unable to cover costs, suppliers liquidation), Design / stakeholder (stakeholder changes, changes to design due to unforeseen circumstances). Construction (access, utilities diversions, ground conditions), Financial (time overrun, price variance). The council will prepare and keep updated on a monthly basis throughout a project risk register for the overall programme. BHCC will work proactively with the contractor and design team to ensure all risks are identified, recorded and monitored – they will be categorised as High Medium and Low. Specific mitigation strategies will be developed to minimise risk impacts to the scheme and allocated to the specific risk owner

f) Describe the key project controls that will be employed by the local authority to ensure that schemes are delivered on time and in budget. (Maximum 250 words)

Provide details of the methods that the authority uses to ensure timely delivery within budget.

A Project Delivery Team will be set up to be responsible for delivery of the project; the project team will sit every month and report into the Seafront Investment Board, producing all necessary reports for them. The Project Delivery Team will benefit from fitting into an existing strategic decision making board. BHCC has a well-established management and governance arrangement for delivering major projects, including the reconstruction of Shelter Hall, seafront arches and Valley Gardens. BHCC's management of the project is based on lines of accountability linking the project team to the senior leadership within the Council. this ensures progress can be monitored, accountability is taken and issues can be addressed and escalated when needed. Specifically for Phase 6&7, a Project Board will be set up to be responsible for delivery of the project. This team will sit every month and report to the SIB, producing all necessary reports for them. The members of the Project Board include the Internal Project Sponsor (Charles Field Interim Director for City Infrastructure), the Internal Project Client, representatives from areas most impacted by the project (Transport, Planning, Seafront estate and Network management) and the project's Communications Manager/Office. The function of the Board is to take responsibility for the strategic direction and management of the programme or project. The Board is responsible for approving budgets, defining and achieving benefits, and monitoring risks, quality and timeliness.

g) Set out if the scheme requires permission from other bodies, and how this permission can be obtained to ensure delivery.

Provide details of the permission required, the likely timescale for obtaining permission and any potential barriers to obtaining that permission.

The scheme is located within prime conservation areas. The overall Architectural design of the new structures must enhance and correspond to their setting to form a coherent aesthetical relationship with the remainder of Brighton's historic seafront. All architectural designs will be subject to full Planning Approval, conservation approval and heritage approval. All internal architectural design will be subject to building regulations and environmental health regulations approval. As with earlier phases of the arches renewal. The Council is highly aware of the importance of the structures and will continue its excellent relationships with appropriate officers and organisations within and external to the Council.

j) If applicable, explain how the scheme development has included consideration of climate adaptation and ensures the future resilience of the highway network (Maximum 250 words).

Describe how climate related risks (e.g., flooding, heat, extreme weather) have been assessed and incorporated into design measures to improve the long term resilience of the highway network. This may

include evidence of risk assessments, adaptive design features, and how the scheme will maintain network performance under future climate conditions.

The future of A259 operation secured as part of these works, the arches supporting the highway network. The structure forms part of Shoreline Management Plan which considers future operation of the seafront in response to climate change. The scheme will avoid failure of the structures and the subsequent diversions and resulting negative climate effects through increased vehicle mileage and pollution. A Flood Risk Assessment will be included as part of the planning application. With the redevelopment of the sea front area the City has already extensively reviewed being resilient to climate change and there are already a number of coastal defence improvements currently being carried out and also planned. This includes the beach areas along the A259.

h) Explain the considerations have been made or will be developed to account for the management of carbon for the development of the scheme.

This may include development of a carbon management plan dealing with whole life carbon (e.g. using low carbon construction measures to deliver the scheme or reducing emissions though reducing vehicle miles).

For earlier phases of the arches renewal programme a Carbon Management Plan (CMP) was prepared, supported by a Whole Life Carbon Assessment (WLCA) and Carbon Summary Table. The findings and understanding from these has informed the design development of the scheme to reduce carbon in the construction. The delivery of the scheme will avoid structural failure which would close the westbound traffic lane, resulting in increased vehicle emissions in sensitive areas caused by diverting traffic. Details of the traffic diversions are included within the Economic Tool.

i) What statutory undertakers affect the proposed scheme? Has any engagement been undertaken and how has this been accounted for within the delivery approach?

Set out the relevant statutory undertakers, the impacts they may have on the programme – including planning – and how this part of the programme will be managed. If applicable, describe how deterioration of the structure has or may impact utilities services and the extent of this disruption.

UKPN substations are within the arches and liaison with these will be ongoing through scheme development. There are key services to be improved or moved and these have been included within our main works cost analysis.

Part 3 – Governance and Declarations

3.1 Equality Analysis

a) Has analysis of the equality impacts of the scheme been undertaken by the LHA in line with the Public Sector Equality Duty? Select below:

☒ Yes

☐ No

b) Explain how the equality impacts of the scheme have been considered or will be considered. Identify the relevant affected groups with protected characteristics, and any planned measures to mitigate these impacts. (Maximum 250 words)

An Equalities Impact Assessment will be carried out as part of the wider social impact. The Council is committed to be a City of Sanctuary with a wide and diverse population of residents and visitors. All development carried out by the council or its partners are required to make improvements to the urban environment; increasing equality, fairness, inclusion, and accessibility. Design, particularly around the streetscape targets improvements using key data:

Age:
41,735 0-15yrs (15%)
196,394 16-64yrs (71%)
38,978 65+ yrs (14%) 6% aged over 75.

Health:
51,000 (22%) adults have two or more long term health conditions
19,000 (8%) adults have mental / physical disabilities
13,500 blue badge holders in the city
6,900 disabled concessionary bus pass holders in the city

Pregnancy and Maternity:
25% of households have dependent children.

Race and Ethnicity:
19.5% are from Black and Racially Minoritised groups,
80.5% are White British.
8.3% do not speak English as their preferred or first language

Sex and Gender:
Gender of Brighton & Hove's population is even (50/50).
0.35% of people aged 16 years plus identify as non-binary

Children and school-aged
Aged 0-15 there are slightly more males (51%) than females (49%).
Age 0-4: 12,987 - Male: 6,715 (52%) - Female: 6,272 (48%)
Age 5-10: 17,384 - Male: 8,873 (51%) - Female: 8,511 (49%)
Age 11-15: 14,379 - Male: 7,386 (51%) - Female: 6,993 (49%)

Deprivation and Poverty
49,833 (17.2%) of Brighton & Hove residents live in one of the most deprived 20% of areas in England

3.2 Public Sector Transparency

When LHAs submit proposals for funding to DfT, as part of the Government's commitment to greater openness in the public sector under the Freedom of Information Act 2000 and the

Environmental Information Regulations 2004, they must also publish a version excluding any commercially sensitive information on their own website within two working days of submitting the final proposal to DfT.

a) Please specify the weblink where this proposal will be published.

TBC – but published via the Brighton and Hove City Website Brighton & Hove City Council

.

3.3 Declarations

Senior Responsible Owner declaration

As Senior Responsible Owner for Kings Road Arches Phases 6 & 7, I hereby submit this request for approval to DfT on behalf of Brighton and Hove City Council and confirm that I have the necessary authority to do so.

I confirm that Brighton and Hove City Council will have all the necessary statutory powers and other relevant consents in place to ensure the planned timescales in this proposal can be realised.

a) Name: Alison McManamon

b) Signed: 

c) Date: 3rd August 2026

d) Email:

Section 151 Officer declaration

As Section 151 Officer for Brighton and Hove City Council, I declare that the scheme cost estimates quoted in this proposal are accurate to the best of my knowledge and that [name of organisation]:

- has allocated sufficient budget to deliver this scheme on the basis of its proposed funding contribution. This will be confirmed by a formal Cabinet decision in September 2026
- accepts responsibility for meeting any costs over and above the DfT contribution requested, including potential cost overruns and the underwriting of any funding contributions expected from third parties.
- accepts responsibility for meeting any ongoing revenue requirements in relation to the scheme.
- accepts that no further increase in DfT funding will be considered beyond the maximum contribution requested and that no DfT funding will be provided after 2029/30.
- confirms that the authority has the necessary governance and assurance arrangements in place and that all legal and other statutory obligations and consents will be adhered to.

e) Name: Elizabeth Griffiths



f) Signed:

g) Date: 03/08/2026

h) Email: Elizabeth.Griffiths@brighton-hove.gov.uk

Mark Rogers
Interim Chief Executive

Executive Assistant: Helen Newark

Sussex & Brighton | Strategic Authority
a Combined County Authority

Department for Transport
Great Minster House
33 Horseferry Road
London, SW1P 4DR

30 July 2026

Dear Sir/Madam,

Re: Support for Brighton & Hove City Council's Structures Fund Application - Kings Road Arches Strengthening - Phases 6 & 7

On behalf of the Sussex & Brighton Strategic Authority (SBSA), I am pleased to provide our support for Brighton & Hove City Council's application to the Department for Transport Structures Fund for Kings Road Arches (Phases 6 and 7).

The Kings Road Arches are a critical infrastructure asset supporting the A259, a strategically important transport corridor that connects communities, businesses and visitor destinations across Brighton & Hove and the wider Sussex region. This stretch of the A259 carries around 26,000-36,000 vehicles, 30,000 pedestrians and 2,000 cyclists daily. The arches themselves also support a number of businesses, making this a unique structure vital to the local economy and therefore maintaining the resilience and reliability of this route is essential to supporting economic growth, sustainable travel and regional connectivity.

The Strategic Authority recognises the significant progress already achieved through previous phases of the Kings Road Arches renewal programme. Earlier investment has enabled the Council to develop a proven delivery approach for the restoration of this complex coastal structure, while demonstrating the value of sustained intervention in safeguarding this important asset. The proposed Phase 6 and 7 works build directly upon that success, allowing the programme to continue in a coordinated and efficient manner and extending the benefits of previous investment. The cost estimates for the current proposal are based on experience gained from the delivery of Phases 4 and 5, which are currently underway.

The funding sought through this application will help secure the long-term future of the Kings Road Arches and the A259 corridor, reducing the risk of future disruption and ensuring continued access to employment, education, tourism and local businesses. It will also support the ongoing regeneration and vitality of Brighton & Hove's seafront, one of the city's most important economic and cultural assets.

As a Strategic Authority committed to improving connectivity and supporting sustainable economic growth across Sussex and Brighton, we believe this scheme represents an excellent opportunity to protect a vital transport asset while maximising the benefits of previous public investment.

We therefore endorse this application and encourage the Department for Transport to give it favourable consideration.

Yours faithfully,

Mark Rogers

Mark Rogers
Interim Chief Executive

Executive Assistant: Helen Newark

Interim Chief Executive
Email: Mark.Rogers2@sussexandbrighton-gov.uk

TRANSPORT FOR THE South East

31st July 2026

Dear Sir/Madam,

Brighton & Hove City Council bid to the Structures Fund – A259 Kings Road Arch Strengthening

I am writing to express Transport for the South East's (TfSE) support for Brighton & Hove City Council's submission to the Structures Fund to secure funding for Phases 6 and 7 of the A259 Kings Road Arches Bridge Strengthening Works.

Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England, bringing together local transport authorities, district and borough councils, business representatives and national delivery partners to provide a unified voice on strategic transport investment across the region. TfSE has a vision-led Transport Strategy in place to influence government decisions about where, when and how to invest in our region to 2050. The strategy sets out five missions to deliver our vision: Strategic Connectivity, Resilience, Inclusion and Integration, Decarbonisation and Sustainable Growth. Our Strategic Investment Plan (SIP) provides a framework for delivering our Transport Strategy, setting out transport infrastructure and policy interventions needed across the region over the coming decades.

The proposed Kings Road Arches strengthening works align particularly strongly with TfSE's Resilience mission, while also supporting Strategic Connectivity, Inclusion and Integration, Decarbonisation and Sustainable Growth. The scheme is identified within TfSE's Strategic Investment Plan as intervention CR01, recognising its importance to the resilience and operation of the Sussex Coast corridor and the wider regional transport network. The route also forms part of the Major Road Network (MRN) and TfSE has played a key role in advising Government on investment priorities across the MRN, recognising the importance of these routes in supporting strategic connectivity, economic growth and network resilience.

The A259 Kings Road is a critical east-west transport corridor along Brighton seafront, carrying significant volumes of motor traffic, pedestrians and cyclists while providing access to the city centre, seafront attractions, businesses, public transport connections and wider coastal communities. The Victorian arches supporting the route form a critical transport asset whose continued operation is fundamental to the resilience and reliability of the wider transport network.

The strengthening works form part of a long-term programme to maintain and improve the structural integrity of the arches. Continued investment is essential to reducing the risk of future deterioration, restrictions and

0300 3309474
tfse@eastsussex.gov.uk
transportforthesoutheast.org.uk
Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

disruption on this strategically important route. The scheme will help maintain connectivity for residents, businesses and visitors, support public transport and active travel movements, and safeguard access to one of the South East's most important economic, tourism and cultural destinations.

The scheme has additional strategic significance as it builds upon previous investment already secured for earlier phases of the Kings Road Arches strengthening programme. The Department for Transport's recent approval of MRN funding for Phases 4 and 5, supported by earlier work involving TfSE, demonstrates the recognised importance of this asset and the wider programme. Funding for Phases 6 and 7 would help maximise the value of that investment, ensuring the benefits of earlier phases are protected and enabling the continued delivery of a coordinated long-term approach to maintaining this critical structure.

The scheme contributes to the resilience of the wider A259 corridor. As part of the Major Road Network and the principal east-west route along much of the South Coast, maintaining the integrity of key assets such as the Kings Road Arches helps ensure that the benefits of investment are realised not only at individual locations but across the corridor as a whole.

The scheme also complements wider transport investment along the corridor, including the recently completed Valley Gardens programme, which has improved conditions for public transport, walking and cycling within Brighton city centre. Maintaining the resilience and reliability of the Kings Road corridor will help ensure these wider investments continue to deliver their intended benefits and support an integrated transport network across the city.

TfSE's Transport Strategy recognises the importance of a transport network that can manage, absorb and recover from disruption, while highlighting that a resilient, well-maintained network reduces long-term costs for both users and the public sector. Given the scheme's identification within TfSE's Strategic Investment Plan as intervention CR01, its location on the Major Road Network, and its importance to regional connectivity, resilience and economic activity, TfSE considers this project to represent a strong case for investment through the Structures Fund.

TfSE therefore supports Brighton & Hove City Council's application to the Structures Fund and looks forward to a positive funding decision.

Yours sincerely



Rupert Clubb
Chief Officer, Transport for the South East

0300 3309474
tfse@eastsussex.gov.uk
transportforthesoutheast.org.uk
Transport for the South East, County Hall,
St. Anne's Crescent, Lewes, BN7 1UE

Brighton & Hove City Council

Cabinet Agenda Item 51

Subject: **Hackney Carriage Fare Review**

Date of meeting: **17 September 2026**

Report of: **Corporate Director of City Operations**

Contact Officer: **Martin Seymour, Alex Evans**
Email: martin.seymour@brighton-hove.gov.uk
Email: alex.evans@brighton-hove.gov.uk

Ward(s) affected: **All**

Key Decision: Yes

Reason(s) Key: Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

1.1 To seek Cabinet approval to sdelegate authority to the Corporate Director, City Operations, in consultation with the Cabinet Member for Culture, Heritage and Tourism, to determine taxi fares in accordance with the statutory scheme, including the current fare review and all future taxi fare reviews.

1.2 The proposed fare increase supports the long-term sustainability of the taxi trade, which forms an important part of the city's transport network and provides an essential service for many residents. Maintaining a safe, reliable, and accessible taxi service contributes to the Council Plan objective of creating an accessible, clean, and sustainable city by supporting movement around the city for residents, workers, and visitors. It also supports the ambition of a fair and inclusive city, helping people who may face barriers to travel including older people, disabled residents, and those with limited transport options to access employment, education, healthcare, and community services. In addition, sustaining a viable taxi fleet contributes to the Council Plan outcome of living and ageing well by promoting independence, reducing social isolation, and supporting access to essential services, while helping to ensure the continued availability of licensed vehicles across the city.

2. Recommendations

2.1 That Cabinet notes the report and agrees that authority be delegated to the Corporate Director, City Operations, in consultation with the Cabinet Member for Culture, Heritage and Tourism, to determine the table of fares set out in Appendix 1 after consideration of any responses received in relation to the Equality Impact Assessment consultation and, in accordance with Section 65

of the Local Government (Miscellaneous Provisions) Act 1976, to publish notice of the proposed fare variation and invite objections.

2.2 That Cabinet agrees that, in the event that objections are received to the proposed variation of the table of fares authority be delegated to the Corporate Director, City Operations, in consultation with the Cabinet member for Culture, Heritage and Tourism to determine the revised table of fares and set the date on which it shall come into force in accordance with the statutory scheme.

2.3 That Cabinet agrees to delegate authority to the Corporate Director, City Operations, in consultation with the Cabinet member for Culture, Heritage and Tourism to determine and implement all future revised taxi fare tables in accordance with the statutory scheme, unless amended or revoked by Cabinet.

3. Context and background information

3.1 The council can set the fares for taxis within the city including charges based on time, distance, and any other costs related to hiring a vehicle. The council cannot set private hire vehicle fares but historically the local operators follow the taxi fare tariffs set by the council.

3.2 On 17 November 2023, the Department for Transport published its updated taxi and private hire vehicle licensing best practice guidance for licensing authorities in England (See background document link).

3.3 The Best Practice Guidance at paragraph 10.2 refers to Setting taxi fare rates.

Setting taxi fare rates

Maximum fare rates should be designed with a view to practicality and reviewed regularly, including any variability of the fare rates dependent on time of day or day of the week. Authorities should consider adopting a simple formula for deciding on fare changes as this will increase understanding and improve the transparency of the process for passengers. The Department recommends that in reviewing fare rates, authorities should pay particular regard to the needs of the travelling public, with reference both to what it is reasonable to expect people to pay but also to the need to give taxi drivers the ability to earn a sufficient income and so incentivise them to provide a service when it is needed. There is likely to be a case for higher fare tariffs at times of higher demand to encourage more drivers to make themselves available or when the journeys are required at anti-social times.

To ensure that taxi tariffs reflect the costs of the trade they should be reviewed following significant changes in licensing fees and other major costs such as fuel. Regular reviews will assist drivers in maintaining their earnings and so continue to attract those seeking to become taxi drivers and provide existing licensees with greater confidence to remain in the trade and plan for future investment in new vehicles. Regular reviews will also avoid large changes in fares for passengers that infrequent reviews are more likely to result in.

3.4 The taxi trade has submitted the following reasons for requesting a fare increase:

- The main reason is to ensure fares keep pace with inflation. The proposed changes closely follow the increase in the Consumer Price Index (CPI) from August 2019 to the present, with some fares rising by less than this rate. The cost of running and maintaining licensed vehicles has increased significantly. This includes higher fuel prices, insurance premiums, and the ongoing expense of meeting the high standards set out in the council's "Blue Book."
- Brighton and Hove have dropped from 14th to joint 38th in the national taxi fare rankings. The proposed fare adjustments aim to restore its position to around joint 14th, bringing it back in line with other local authorities.
- With the Government living wage rising to £13.45 per hour, fares need to support drivers in achieving this income. For example, a driver working on a 50/50 arrangement will need to earn at least £30.00 per hour to collect living wage particularly if they also cover fuel costs.

3.5 The taxi trade is not requesting an increase to the initial starting fare (flag fall). Instead, they propose reducing the distance increments (yardage) between fare increases. This approach spreads the increase more fairly across all journey lengths, while keeping short journeys more affordable for vulnerable customers.

3.6 Overall, the proposed fare changes are intended to help drivers and vehicle owners meet increasing operating costs, maintain high vehicle and service standards, and earn a reasonable livelihood, whilst seeking to minimise the impact on passengers, particularly those who rely on taxis for short but essential journeys. Taxi fares are influenced by local operating and living costs, and Brighton & Hove experiences many of the cost pressures associated with a South East coastal city. Even with the proposed increase, Brighton & Hove would remain broadly in line with comparable local authorities, including Lewes and Worthing, rather than becoming an outlier nationally.

3.7 The proposed tariff also continues to represent good value for passengers travelling at night. Unlike many authorities that apply a night tariff of up to 1.5 times the daytime rate, Brighton & Hove's tariff structure applies only a modest supplement to the initial fare, meaning the city's evening and overnight charges remain comparatively low.

3.8 The proposed increase is therefore considered both proportionate and necessary to support a viable, accessible, and sustainable taxi service. In doing so, it helps ensure the continued availability of licensed vehicles for residents and visitors, supports independent living and access to essential services, and contributes to the Council Plan objectives of creating an accessible, inclusive, and sustainable city.

3.9 Applications to increase taxi fares are made through the Council's Taxi Forum and based on inflation figures from the Consumer Price Index (CPI), published

by the Office for National Statistics. Where there is agreement within the taxi trade for a fare increase, representatives of the trade are invited to a meeting to discuss any proposals with Council officers and Chair of the Licensing Committee. Any proposal agreed at that meeting is then presented to the next available Cabinet meeting for consideration.

3.10 Inflation figures published by the Office for National Statistics show that CPI increased by 30% between August 2019 and March 2026. The proposed fare changes represent a 27.55% increase over the same period, which is below the CPI rate. Since the last fare increase in March 2024, this equates to an average increase of approximately 7.4% for journeys over 10 miles. In addition, it is proposed to increase the waiting time charge from £20 to £30 per hour to help drivers work towards earning the national living wage.

3.11 The proposal from the trade equates to a 30p increase per mile to £3.30. The proposed Table of Fares can be seen at Appendix 1 and a % change table can be seen at Appendix 2.

3.12 Tariffs 6 to 10 are set at 1.5 x the rates of tariffs 1 to 5. These higher tariffs were introduced to encourage vehicle proprietors to invest in wheelchair accessible vehicles and apply to vehicles carrying 5 or more passengers.

3.13 Brighton & Hove's current two-mile Tariff 1 fare of £8.70 ranks 38th nationally and is the fifth highest fare within a comparator group of 17 authorities with similar demographic, economic, housing and deprivation characteristics. Neighbouring Sussex authorities have also been included to provide regional context. Benchmarking data and comparative rankings are attached at Appendix 4.

3.14 A proposed fare of £9.30 would move Brighton & Hove to joint 15th nationally, alongside Edinburgh and Glasgow. Within the comparator and Sussex comparison group, Brighton & Hove would rank third highest, behind Eastbourne (£9.60) and Arun (£9.50). This would position Brighton & Hove towards the upper end of comparable licensing authorities whilst remaining within the range of fares currently approved elsewhere.

3.15 When considering these rankings, it should be noted that national fare tables are relatively compressed. For example, an increase from £8.70 to £9.30 for a two-mile daytime journey would result in a rise of around 23 places in the national rankings, despite representing a difference of only 60p. National rankings should therefore be regarded as a benchmarking tool rather than an indication of materially different fare levels between authorities.

3.16 The timing of fare reviews also affects comparative rankings. Several authorities currently ranked above Brighton & Hove, including Eastbourne, Arun, and Lewes, have already implemented fare increases during 2026, while a number of comparator authorities have not reviewed fares since 2022 or 2023. In addition, the PHTM Hackney Taxi Fare Tables are updated monthly and therefore provide only a snapshot of fare levels at a particular point in time. Relative positions are likely to change as authorities continue to review fares in response to inflationary and operating cost pressures.

4. Analysis and consideration of alternative options

4.1 Licensing authorities have discretion to set taxi fares within their area. Drivers are not permitted to charge more than the metered fare, except where a higher fare has been agreed in advance for journeys which terminate outside the city. Exercising this power offers passenger protection. However, if fares are not reviewed regularly, it may lead to businesses becoming unviable and a shortage of taxis to meet demand.

5. Community engagement and consultation

5.1 The review of taxi fares has been considered through the Council's taxi and private hire consultation forum, where trade representatives and other stakeholders have had the opportunity to provide views and comments on proposed fare revisions. The trade has nominated representatives to engage with the Council and present the collective views of the taxi sector.

5.2 The established process for requesting a fare review has been followed. This process enables the trade's nominated representatives to submit proposals and supporting evidence for consideration by the Chair of The Licensing Committee (non-Licensing Act 2003) and relevant council officers.

5.3 On 28 May 2026, a meeting was held between trade representatives, the Chair of the Licensing Committee, and council officers to consider a proposed revision to the taxi fares table. A proposal was agreed in principle and intended for referral to the Licensing Committee. However, subsequent legal advice confirmed that the setting of taxi fares is as an executive function, and therefore, any decision on the proposed fare revision must be taken by Cabinet.

5.4 In addition to the statutory consultation requirements set out below, the Council is currently undertaking a four-week engagement exercise on the Equality Impact Assessment (EIA) to provide stakeholders with an opportunity to comment on the assessment of the potential equality impacts of the proposed fare revision. This engagement period will conclude before any delegated decision is taken in relation to the proposed fares.

5.5 Should Cabinet approve the recommendation at paragraph 2.1, any responses received through the EIA engagement process will be considered by the Corporate Director, City Operations, in consultation with the Cabinet Member for Culture, Heritage and Tourism, before determining whether to proceed with the proposed table of fares. Any relevant issues raised through the EIA engagement will be taken into account as part of the decision-making process.

5.6 If Cabinet approves the recommendation at paragraph 2.1, and following completion of the EIA engagement period and consideration of any responses received, the Corporate Director, City Operations, in consultation with the Cabinet Member for Culture, Heritage and Tourism, will determine the

proposed table of fares. Once that determination has been made, the Council will commence the statutory consultation process required by section 65 of the Local Government (Miscellaneous Provisions) Act 1976.

5.7 This requires the Council to publish notice of the proposed fare variation in a local newspaper, setting out the proposed table of fares and inviting objections. The notice must specify a period of at least 14 days during which objections may be submitted and explain how objections can be made. A copy of the notice must also be made available for public inspection. If no objections are received, or if all objections are withdrawn, the revised fares may take effect at the end of the consultation period. Where objections are received and not withdrawn, those objections must be considered before a final decision is taken on whether the proposed fares should be implemented, with or without modification, and a commencement date set in accordance with the statutory requirements.

5.8 Where no objections are received, or where all objections are withdrawn, the revised fares may take effect at the end of the consultation period.

5.9 If objections are received and not withdrawn, the Council must consider those objections before determining whether the proposed fares should be implemented, with or without modification. Objections may relate to matters such as the level of the proposed fares, affordability for passengers, the financial viability of the trade, or the potential impact on service provision. Any objections received will be considered alongside the rationale for the proposed fare increase and any supporting evidence provided by the trade or other interested parties. In such circumstances, the revised fares must come into force on a date set by the Council, no later than two months after the date originally specified in the notice.

5.10 The statutory process therefore provides an opportunity for licence holders, service users, and other interested parties to comment on the proposed fare revision before any changes are introduced.

5.11 To enable the statutory process to be completed efficiently and within the prescribed timescales, it is proposed that authority be delegated to the Corporate Director, City Operations, in consultation with the Cabinet Member for Culture, Heritage and Tourism, to consider and determine any objections received during the statutory consultation period and determine the final table of fares and commencement date.

6. Financial implications

6.1 The cost of advertising the proposed fare increases will be met from the existing taxi revenue budget. The fare levels outlined in this report are used by the trade and are not an income stream to the council.

6.2 The fares review doesn't have any budget implications for school transport. Home-to-school travel costs are covered through contractual arrangements between the school's transport team and operators, and work in the same way

as pre-booked private hire journeys. The taxi fares review only applies to journeys that start from a taxi rank or where a taxi is hailed in the street.

Name of finance officer consulted: David Wilder
Date consulted (26/06/2026)

7. Legal implications

7.1 The power to fix fares for taxis is provided by Section 65 of the Local Government (Miscellaneous Provisions) Act 1976. The procedure is set out in the body of the report.

Name of lawyer consulted: Rebecca Sidell
Date consulted (25/06/26):

8. Equalities implications

8.1 Taxis provide an important transport option for residents and visitors, particularly disabled people, older people, and others who are unable to use public transport easily. They support access to employment, healthcare, education, and other essential services.

8.2 An Equality Impact Assessment has been undertaken. While the proposed fare increase may increase costs for some passengers, particularly those who rely on taxis regularly, this must be balanced against the need to maintain a safe, reliable, accessible, and financially sustainable taxi service.

8.3 The proposal seeks to mitigate impacts by retaining the £3 starting fare and limiting fare increases to an average of 30 pence per mile. This is intended to reduce the impact on shorter local journeys while helping to address increased operating, compliance and vehicle replacement costs faced by the trade.

8.4 The Equality Impact Assessment concluded that the proposal is proportionate and seeks to balance affordability with the longer-term sustainability, accessibility, and availability of taxi services across the city. Maintaining a viable taxi trade is expected to support the continued availability of wheelchair-accessible vehicles and reduce the risk of declining service provision for those residents who rely most on taxis for independent travel.

9. Sustainability implications

9.1 The role of the taxi trade is included in the Local Transport Plan, which identifies it as a key element in providing sustainable transport choices. It creates important links in the transport network to other forms of sustainable transport providing a seamless connection. It will contribute to three of the government's four shared transport priorities – reducing congestion, improving air quality and accessibility. Use of taxis for school transport, licensed vehicles using bus lanes, locating ranks at railway stations and the city coach station, approved use of liquid petroleum gas and provision of

Rapid Charging Hubs all contribute to reducing congestion and moving passengers quickly.

10. Conclusion

10.1 The proposed fare increase seeks to strike an appropriate balance between supporting the long-term viability of the taxi trade and protecting passengers from excessive fare increases. The review recognises the significant cost pressures faced by drivers and vehicle proprietors, including vehicle purchase and maintenance costs, insurance, fuel, and broader increases in the cost of living.

10.2 The proposed tariff changes are considered reasonable and proportionate when compared with neighbouring and comparable licensing authorities and will help ensure that taxi driving remains a viable occupation, supporting the retention and recruitment of drivers and the continued availability of licensed vehicles across the city.

10.3 A sustainable and well-regulated taxi service plays an important role in Brighton & Hove's wider transport network, providing an accessible and flexible form of transport for residents and visitors, particularly those who may have limited alternative travel options. The proposed changes therefore support the council's objectives of maintaining an accessible, inclusive, and sustainable transport system, whilst continuing to safeguard the interests of passengers through the regulation of maximum fares.

10.4 The Chair of the Licensing Committee confirmed their support for the proposed fare review following a meeting with trade representatives and licensing officers on the 28 May 2026. For the reasons set out in this report, it is recommended that Cabinet approve the proposed fare increase and delegate authority to the Corporate Director, City Operations, in consultation with the Cabinet member for Transport and City Infrastructure, to determine the revised table of fares and implementation date. Including consideration of any objections received during the statutory consultation period.

Supporting Documentation

Appendices

1. Proposed Table of Fares
2. Proposed and Existing Tariffs Comparison (Tariffs 1 to 5)
3. Proposed and Existing Tariffs Comparison (Tariffs 6 to 10)
4. Benchmarking data and comparative rankings
5. Equalities Statement

Background Documents

1. Department for Transport Taxi and private hire vehicle licensing best practice guidance

BRIGHTON & HOVE CITY COUNCIL
MAXIMUM HACKNEY CARRIAGE FARES
Section 65 of the Local Government (Miscellaneous Provisions) Act 1976

The fares apply to all hiring's within Brighton & Hove City. Journeys ending outside the city area may not exceed the authorised metered maximum fare unless a **prior contract** is made with the driver at the time of hiring.

The fare YOU SHOULD PAY along with the relevant Tariff code will be shown automatically on the Taximeter.

ONLY EXTRA CHARGES MARKED ** MAY BE ADDED TO THE METER BY THE DRIVER.

Tariff 1 – NORMAL FARE Applies to all hiring's except those mentioned in tariffs 2,3,4,5,6,7,8,9,10 Initial distance not exceeding 160 yards or 36 seconds or a combination of distance and time.	**£3.00**	For all or part of each subsequent 160 yards or 36 seconds or a combination of distance and time.	**30p**
Tariff 2 - Night each day between the hours of 9pm and midnight, **Sundays** – between the hours of 6am and midnight. **Bank or Public Holiday -** between the hours of 6am and midnight excluding the times covered by Christmas Day and New Year extra charges Initial distance not exceeding 160 yards or 36 seconds or a combination of distance and time.	**£4.00**	For all or part of each subsequent 160 yards or 36 seconds or a combination of distance and time.	**30p**
Tariff 3 – Late Night each day between the hours of midnight and 6am excluding the times covered by Tariffs 4 & 5 Initial distance not exceeding 160 yards or 36 seconds or a combination of dist	**£5.00**	For all or part of each subsequent 160 yards or 36 seconds or a combination of distance and time	**30p**
Tariff 4 - Christmas Day & Boxing Day between 9pm 24 December and 6am 27 December. **New Year -** between 6am and 10am 1st January Initial distance not exceeding 160 yards or 36 seconds or a combination of distance and time.	**£4.50**	For all or part of each subsequent 160 yards or 36 seconds or a combination of distance and time.	**45p**
Tariff 5 - New Year between 9pm 31 December and 6am 1 January Initial distance not exceeding 160 yards or 36 seconds or a combination of distance and time.	**£6.00**	For all or part of each subsequent 160 yards or 36 seconds or a combination of distance and time.	**60p**

For Journeys with 5 to 8 passengers the following tariffs may apply

Tariff 6 – NORMAL FARE Applies to all hiring's except those mentioned in tariffs 1,2,3,4,5,7,8,9&10 Initial distance not exceeding 160 yards or 36 seconds or a combination of distance and time.	**£4.50**	For all or part of each subsequent 160 yards or 36 seconds or a combination of distance and time.	**45p**
Tariff 7 - Night each day between the hours of 9pm and midnight **Sundays** – between the hours of 6am and midnight **Bank or Public Holiday -** excluding the times covered by Christmas and new year extra charge. Initial distance not exceeding 160 yards or 36 seconds or a combination of distance and time.	**£6.00**	For all or part of each subsequent 160 yards or 36 seconds or a combination of distance and time.	**45p**
Tariff 8 – Late Night each day between the hours of midnight and 6am excluding the times covered by Tariffs 9 & 10 Initial distance not exceeding 160 yards or 36 seconds or a combination of distance and time.	**£7.50**	For all or part of each subsequent 160 yards or 36 seconds or a combination of distance and time.	**45p**
Tariff 9 - Christmas Day & Boxing Day between 9pm 24 December and 6am 27 December. **New Year -** between 6am and 10am 1st January Initial distance not exceeding 160 yards or 36 seconds or a combination of distance and time.	**£6.75**	For all or part of each subsequent 160 yards or 36 seconds or a combination of distance and time.	**70p**

Tariff 10 – New Year between 9pm 31 December and 6am 1st January Initial distance not exceeding 160 yards or 36 seconds or a combination of distance and time.	**£9.00**	For all or part of each subsequent 160 yards or 36 seconds or a combination of distance and time.	**90p**

Extra Charges – that may be added to the metered fare by the driver	
***Fouling Charge (Charge levied dependent on extent and type of Fouling)** **Booking Fee for telephone and pre-booked hirings ***The driver may charge any road charges or tolls where applicable (this must be agreed with the customer before hire commences)	*** UPTO £100.00*** ****20p****

The maximum number of persons this vehicle is licensed to carry includes children of any age.
Payment for journeys may be requested by the driver in advance of the journey.
A person who hires this vehicle but makes off without paying the fare in full commits an offence.
****An operator's account administration charges, including VAT at the current rate, agreed by prior contract, may be charged separately and if charged will form part of the fare for the purpose of any legislation.

******These charges cannot be added by the driver to the fare shown on the taximeter.**

Any COMPLAINTS should be made in writing and sent to the Hackney Carriage Office,
Hove Town Hall, Norton Road, Hove, BN3 3BQ or email to hco@brighton-hove.gov.uk **September 2026**

Proposal September 2026

CURRENT TARIFF

	TARIFF 1	TARIFF 2	TARIFF 3	TARIFF 4	TARIFF 5
Name :	TARIFF 1	TARIFF 2	TARIFF 3	TARIFF 4	TARIFF 5
Date:	01/03/2024	01/03/2024	01/03/2024	01/03/2024	01/03/2024
Soiling charge:	£100.00	£100.00	£100.00	£100.00	£100.00
Wait:	54 (secs)	54 (secs)	54 (secs)	54 (secs)	54 (secs)
Flag fall:	£3.00 A	£4.00 A	£5.00 A	£4.50 A	£6.00 A
Initial yardage:	176 B	176 B	176 B	176 B	176 B
Unit thereafter:	176 C	176 C	176 C	176 C	176 C
Price unit :	0.3 D	0.3 D	0.3 D	0.45 D	0.6 D
Initial Waiting Time (secs):	54	54	54	54	54

PROPOSAL - Sepember 2026

	TARIFF 1	TARIFF 2	TARIFF 3	TARIFF 4	TARIFF 5
Name :	TARIFF 1	TARIFF 2	TARIFF 3	TARIFF 4	TARIFF 5
Soiling charge:	£100.00	£100.00	£100.00	£100.00	£100.00
Wait:	36 (secs)	36 (secs)	36 (secs)	36 (secs)	36 (secs)
Flag fall:	£3.00 A	£4.00 A	£5.00 A	£4.50 A	£6.00 A
Initial yardage:	160 B	160 B	160 B	160 B	160 B
thereafter:	160 C	Unit thereafter: 160 C	thereafter: 160 C	Unit thereafter: 160 C	Unit thereafter: 160 C
Price unit :	0.3 D	0.3 D	0.3 D	0.45 D	0.6 D
Initial Waiting Time (secs):	36	36	36	36	36

Distance (miles)	TARIFF 1 *Current*	TARIFF 1 *Proposed*	TARIFF 1 *% Change*	Distance (miles)	TARIFF 2 *Current*	TARIFF 2 *Proposed*	TARIFF 2 *% Change*	Distance (miles)	TARIFF 3 *Current*	TARIFF 3 *Proposed*	TARIFF 3 *% Change*	Distance (miles)	TARIFF 4 *Current*	TARIFF 4 *Proposed*	TARIFF 4 *% Change*	Distance (miles)	TARIFF 5 *Current*	TARIFF 5 *Proposed*	TARIFF 5 *% Change*
Flag	£3.00	**£3.00**	0.00%	Flag	£4.00	**£4.00**	0.00%	Flag	£5.00	**£5.00**	0.00%	Flag	£4.50	**£4.50**	0.00%	Flag	£6.00	**£6.00**	0.00%
1	£5.70	**£6.00**	5.26%	1	£6.70	**£7.00**	4.48%	1	£7.70	**£8.00**	3.90%	1	£8.55	**£9.00**	5.26%	1	£11.40	**£12.00**	5.26%
2	£8.70	**£9.30**	6.90%	2	£9.70	**£10.30**	6.19%	2	£10.70	**£11.30**	5.61%	2	£13.05	**£13.95**	6.90%	2	£17.40	**£18.60**	6.90%
3	£11.70	**£12.60**	7.69%	3	£12.70	**£13.60**	7.09%	3	£13.70	**£14.60**	6.57%	3	£17.55	**£18.90**	7.69%	3	£23.40	**£25.20**	7.69%
4	£14.70	**£15.90**	8.16%	4	£15.70	**£16.90**	7.64%	4	£16.70	**£17.90**	7.19%	4	£22.05	**£23.85**	8.16%	4	£29.40	**£31.80**	8.16%
5	£17.70	**£19.20**	8.47%	5	£18.70	**£20.20**	8.02%	5	£19.70	**£21.20**	7.61%	5	£26.55	**£28.80**	8.47%	5	£35.40	**£38.40**	8.47%
6	£20.70	**£22.50**	8.70%	6	£21.70	**£23.50**	8.29%	6	£22.70	**£24.50**	7.93%	6	£31.05	**£33.75**	8.70%	6	£41.40	**£45.00**	8.70%
7	£23.70	**£25.80**	8.86%	7	£24.70	**£26.80**	8.50%	7	£25.70	**£27.80**	8.17%	7	£35.55	**£38.70**	8.86%	7	£47.40	**£51.60**	8.86%
8	£26.70	**£29.10**	8.99%	8	£27.70	**£30.10**	8.66%	8	£28.70	**£31.10**	8.36%	8	£40.05	**£43.65**	8.99%	8	£53.40	**£58.20**	8.99%
9	£29.70	**£32.40**	9.09%	9	£30.70	**£33.40**	8.79%	9	£31.70	**£34.40**	8.52%	9	£44.55	**£48.60**	9.09%	9	£59.40	**£64.80**	9.09%
10	£32.70	**£35.70**	9.17%	10	£33.70	**£36.70**	8.90%	10	£34.70	**£37.70**	8.65%	10	£49.05	**£53.55**	9.17%	10	£65.40	**£71.40**	9.17%
			7.39%				**6.96%**				**6.59%**				**7.39%**				**7.39%**

Proposal September 2026

CURRENT TARIFF

	TARIFF 6	TARIFF 7	TARIFF 8	TARIFF 9	TARIFF 10
Name :	TARIFF 6	TARIFF 7	TARIFF 8	TARIFF 9	TARIFF 10
Date:	01/03/2024	01/03/2024	01/03/2024	01/03/2024	01/03/2022
Soiling charge:	£100.00	£100.00	£100.00	£100.00	£100.00
Wait:	54 (secs)	54 (secs)	54 (secs)	54 (secs)	54 (secs)
Flag fall:	£4.50 A	£6.00 A	£7.50 A	£6.75 A	£9.00 A
Initial yardage:	176 B	176 B	176 B	176 B	176 B
Unit thereafter:	176 C	176 C	176 C	176 C	176 C
Price unit :	0.45 D	0.45 D	0.45 D	0.7 D	0.9 D
Initial Waiting Time (secs):	54	54	54	54	54

PROPOSAL - September 2026

	TARIFF 6	TARIFF 7	TARIFF 8	TARIFF 9	TARIFF 10
Name :	TARIFF 6	TARIFF 7	TARIFF 8	TARIFF 9	TARIFF 10
Soiling charge:	£100.00	£100.00	£100.00	£100.00	£100.00
Wait:	36 (secs)	36 (secs)	36 (secs)	36 (secs)	36 (secs)
Flag fall:	£4.50 A	£6.00 A	£7.50 A	£6.75 A	£9.00 A
Initial yardage:	160 B	160 B	160 B	160 B	160 B
Unit thereafter:	160 C	160 C	160 C	160 C	160 C
Price unit :	0.45 D	0.45 D	0.45 D	0.7 D	0.9 D
Initial Waiting Time (secs):	36	36	36	36	36

Distance (miles)	TARIFF 6 Current	TARIFF 6 Proposed	TARIFF 6 % Change	Distance (miles)	TARIFF 7 Current	TARIFF 7 Proposed	TARIFF 7 % Change	Distance (miles)	TARIFF 8 Current	TARIFF 8 Proposed	TARIFF 8 % Change	Distance (miles)	TARIFF 9 Current	TARIFF 9 Proposed	TARIFF 9 % Change	Distance (miles)	TARIFF 10 Current	TARIFF 10 Proposed	TARIFF 10 % Change
Flag	£4.50	**£4.50**	0.00%	Flag	**£6.00**	**£6.00**	**0.00%**	Flag	£7.50	£7.50	0.00%	Flag	£6.75	£6.75	0.00%	Flag	£9.00	£9.00	0.00%
1	£8.55	**£9.00**	5.26%	1	**£10.05**	**£10.50**	**4.48%**	1	£11.55	£12.00	3.90%	1	£13.05	£13.75	5.36%	1	£17.10	£18.00	5.26%
2	£13.05	**£13.95**	6.90%	2	**£14.55**	**£15.45**	**6.19%**	2	£16.05	£16.95	5.61%	2	£20.05	£21.45	6.98%	2	£26.10	£27.90	6.90%
3	£17.55	**£18.90**	7.69%	3	**£19.05**	**£20.40**	**7.09%**	3	£20.55	£21.90	6.57%	3	£27.05	£29.15	7.76%	3	£35.10	£37.80	7.69%
4	£22.05	**£23.85**	8.16%	4	**£23.55**	**£25.35**	**7.64%**	4	£25.05	£26.85	7.19%	4	£34.05	£36.85	8.22%	4	£44.10	£47.70	8.16%
5	£26.55	**£28.80**	8.47%	5	**£28.05**	**£30.30**	**8.02%**	5	£29.55	£31.80	7.61%	5	£41.05	£44.55	8.53%	5	£53.10	£57.60	8.47%
6	£31.05	**£33.75**	8.70%	6	**£32.55**	**£35.25**	**8.29%**	6	£34.05	£36.75	7.93%	6	£48.05	£52.25	8.74%	6	£62.10	£67.50	8.70%
7	£35.55	**£38.70**	8.86%	7	**£37.05**	**£40.20**	**8.50%**	7	£38.55	£41.70	8.17%	7	£55.05	£59.95	8.90%	7	£71.10	£77.40	8.86%
8	£40.05	**£43.65**	8.99%	8	**£41.55**	**£45.15**	**8.66%**	8	£43.05	£46.65	8.36%	8	£62.05	£67.65	9.02%	8	£80.10	£87.30	8.99%
9	£44.55	**£48.60**	9.09%	9	**£46.05**	**£50.10**	**8.79%**	9	£47.55	£51.60	8.52%	9	£69.05	£75.35	9.12%	9	£89.10	£97.20	9.09%
10	£49.05	**£53.55**	9.17%	10	**£50.55**	**£55.05**	**8.90%**	10	£52.05	£56.55	8.65%	10	£76.05	£83.05	9.20%	10	£98.10	£107.10	9.17%

Note: CPI 30% From August 2019 to March 2026

Appendix 4: Benchmarking data and comparative rankings

Authority	Type	PHTM Rank	2-Mile Tariff 1 Fare	Last Rise
Eastbourne	Borough	8	£9.60	2026
Arun	District Council	10	£9.50	2026
Brighton & Hove (Proposed)	Unitary	15	£9.30	2026
Lewes	District Council	18	£9.20	2026
Worthing	Borough	21	£9.10	2025
Mid Sussex	District Council	24	£9.00	2024
Reading	Unitary	26	£9.00	2023
Brighton & Hove (Current)	Unitary	38	£8.70	2024
Bournemouth, Christchurch & Poole	Unitary	50	£8.52	2024
Slough	Unitary Authority	54	£8.50	2025
Medway	Unitary	60	£8.40	2025
Southampton	Unitary	61	£8.40	2023
Bristol City	Unitary Authority	71	£8.20	2025
Plymouth	Unitary Authority	85	£8.10	2023
Nottingham	Unitary	98	£8.00	2022
York	Unitary	105	£8.00	2023
Adur	District Council	86	£7.80	2023
Leicester	Unitary	116	£7.80	2025
Southend-on-Sea	Unitary Authority	121	£7.80	2024
Milton Keynes	Unitary Authority	153	£7.55	2025
Portsmouth	Unitary Authority	171	£7.40	2023
Luton	Unitary Authority	199	£7.20	2024

Hackney Carriage (Taxi) Fares Review 2026

Equalities Statement

The Taxi and Private Hire Licensing Team has begun an Equality Impact Assessment (EIA) of the proposed changes to maximum taxi fares. The assessment has been informed by available national and local evidence, including transport, Census and Joint Strategic Needs Assessment (JSNA) data. It identifies potential disproportionate financial impacts on disabled people, older people, carers, people who experience domestic abuse, sexual violence, exploitation and harassment, and residents experiencing socio-economic disadvantage, particularly where they rely on taxi transport for healthcare, independent living, caring responsibilities, and other essential journeys. The assessment also recognises that, for some individuals, the impact of a fare increase may be cumulative where taxis are used frequently for healthcare appointments, employment, caring responsibilities, education, independent living, or other regular essential journeys

The assessment also recognises the competing equality consideration of maintaining a viable, reliable, and accessible taxi service. A reduction in the availability of taxis, particularly wheelchair-accessible vehicles, could itself disproportionately affect disabled and older residents, carers, and others with limited access to suitable alternative transport. The proposal therefore seeks to balance passenger affordability with the continued sustainability, accessibility, and availability of the licensed taxi fleet. Brighton & Hove currently licenses a substantial number of wheelchair-accessible taxis which form an important part of the city's accessible transport network, supporting independent living and access to employment, healthcare, education, and community activities. The assessment further recognises that some residents may experience multiple and overlapping disadvantages, for example being disabled and on a low income, or being an older person with limited transport alternatives. In such circumstances, reliance on taxi services and sensitivity to fare increases may be greater than when considering individual characteristics in isolation

The EIA remains under development. The Council does not routinely hold equality monitoring information about taxi passengers, and direct engagement with local disabled and older residents and their representative organisations has not yet informed the assessment. Whilst national and local data provide an important evidence base, further engagement is required to better understand the lived experience of those groups most likely to be affected by the proposal.

The Taxi and Private Hire Licensing Team will therefore undertake proportionate, targeted, and accessible engagement with both the taxi trade and relevant community organisations, including organisations representing disabled people, older people, and other potentially affected groups. Engagement will seek views on how different groups use taxi services, the affordability of the proposed fare increase, the importance of taxis for essential journeys, the availability of alternative transport

options and any potential mitigating measures. Particular emphasis will be placed on gathering quantitative evidence, service-user feedback, lived experience, and case studies to better understand the extent of reliance on taxi services and the potential impacts of the proposal on different groups. Information will be made available in accessible formats and participants will have the opportunity to identify any access requirements.

The findings of this engagement will be used to test and refine the assumptions set out in the draft EIA. Where engagement identifies additional impacts, evidence or potential mitigations, the assessment will be updated accordingly. Where engagement broadly supports the current analysis, the findings will strengthen and validate the Council's understanding of the likely equality impacts. Feedback, statutory objections, and any available equality information will be considered and used to update the EIA, impact analysis, mitigations, and monitoring arrangements before any final decision is taken. Any mitigation and monitoring arrangements will be proportionate to the nature and scale of the impacts identified and will be designed to make best use of existing Council and licensing processes wherever possible.

Following implementation, the Council will keep the impacts of the fare review under review through existing licensing, accessibility, and stakeholder engagement arrangements. Particular attention will be given to any evidence of disproportionate impacts on disabled people, older people, carers, and residents experiencing socio-economic disadvantage, as well as to the ongoing availability of wheelchair-accessible vehicles. Any significant issues identified through monitoring, complaints, engagement, or service intelligence will be considered and, where appropriate, inform further review, mitigation, or future fare-setting decisions.

Councillors are asked to have due regard to both the potential adverse and positive equality impacts identified to date, the limitations of the current evidence base, and the commitment to further engagement, review and monitoring when considering the recommendations contained in this report.

Brighton & Hove City Council

Cabinet

Agenda Item 52

Subject: **Management of Tent and Vehicle Encampments: Delivery Update and Future Welfare-Led Approach**

Date of meeting: **Thursday, 17 September 2026**

Report of: **Cabinet Member for Children, Families and Youth Services**

Lead Officer: **Corporate Director for Families, Children and Wellbeing**

Contact Officer: **Richard Tuset**

Email: richard.tuset@brighton-hove.go

Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key: Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

1.1 This report updates Cabinet on the strengthened approach being developed for managing unauthorised tent and vehicle encampments across Brighton & Hove. It brings together the operational improvements already completed and underway, including clearer method statements, weekly multi-agency coordination, escalation arrangements, additional staffing capacity, targeted use of vehicle removal powers, Traffic Regulation Orders and physical prevention measures

1.2 The council's approach remains welfare led, evidence based and proportionate. For tent encampments, this includes established welfare engagement, support offers and safeguarding checks before enforcement action is considered. For vehicle encampments, the council is now strengthening operational delivery and developing a future welfare led model, recognising that people living in vehicles do not currently receive the same routine outreach and welfare engagement as people living in tents.

1.3 The approach to the management of tents and vehicle encampments is aligned to the Council Plan priority of a fair and inclusive city, where people feel safe, included and welcome.

2. Recommendations

2.1 Cabinet notes the operational improvements being undertaken to strengthen the management of unauthorised tent and vehicle encampments across the city, including clearer operational processes, enhanced multi-agency

coordination, strengthened governance arrangements, targeted enforcement activity, preventative measures and additional staffing capacity.

2.2 Cabinet endorses the continuation of a phased and balanced approach to encampment management, combining welfare engagement, proportionate enforcement, prevention activity and effective partnership working, as set out at paragraph 4.1 (Option 2).

2.3 Cabinet notes that the council is developing a welfare-led approach for people living in vehicle encampments, aligned with the planned recommissioning of outreach services and subject to consideration through the 2027/28 budget setting process.

2.4 Cabinet delegates authority to the Corporate Director Families, Children & Wellbeing in consultation with the Cabinet Member for Children, Families and Youth Services, to progress the development of the Encampments Service and implement operational changes required in response to evolving service needs and demand pressures.

3. Context and background information

3.1 Unauthorised encampments, both tents and vehicles, have become increasingly visible and complex across Brighton & Hove in recent years. They present overlapping challenges relating to homelessness, welfare, public safety, environmental impact and community concern.

3.2 Tent encampments fluctuate seasonally, with higher numbers during summer months and concentrations in locations such as the seafront and Hove Lawns. Many individuals living in tents present with multiple and complex needs, including homelessness, poor physical and mental health, substance misuse and wider vulnerability.

3.3 Vehicle encampments have also increased in visibility across the city. Circumstances vary considerably, ranging from individuals experiencing acute housing need through to those pursuing alternative living arrangements. Notwithstanding these differing circumstances, the council increasingly encounters individuals living in vehicles who have significant welfare, health and support needs.

3.4 The council's response to encampments has historically differed between tents and vehicles. For tent encampments, a welfare-led model has been established over several years, involving early engagement with outreach services, welfare assessments, safeguarding checks, and offers of support and accommodation pathways prior to enforcement action wherever appropriate. This approach typically includes repeated contact with individuals, assessment of vulnerability and support needs, and multi-agency working involving outreach, housing and relevant council services. Vehicle encampments have historically relied more heavily on legal and enforcement powers, supported by more limited welfare engagement.

3.5 A range of service improvements have already been introduced to strengthen the council's response to encampments and improve consistency, coordination and effectiveness across services. These changes have been introduced in two phases, with Phase 1 complete and Phase 2 currently being implemented:

Phase 1 – Completed

- **Development of clearer operational method statements**, including agreed processes, roles and responsibilities across services.
- **Weekly multi-agency coordination meetings**, bringing together outreach services, enforcement teams, housing, legal and land-managing services.
- **Escalation meetings with senior officers**, including weekly escalation to Head of Service level and regular oversight at Corporate Director level.
- **Expanded use of Bye Laws, Community Protection Warnings and Notices (CPW/CPN)** to address persistent anti-social behaviour associated with some encampments, such as noise nuisance, fly-tipping and environmental impacts.
- **Establishment of a vehicle processing facility**, addressing key operational barriers that has previously limited enforcement activity for vehicle encampments, for example the cleansing and storage of vehicles before their disposal.

3.6 The purpose of this phase is not simply to increase enforcement activity. It is intended to improve consistency, strengthen operational coordination, test the effectiveness of different interventions and generate local evidence to inform future decisions.

3.7 Detailed operational method statements for the management of both tent and vehicle encampments, described above, are included at Appendix 1 and Appendix 2. These set out the standard processes, including stages of engagement, legal routes, escalation points and indicative timescales. These processes are designed to ensure that decision-making is structured, proportionate and legally robust, while maintaining a clear audit trail for enforcement activity.

3.8 It is important to note that the council's approach is welfare-led. As such, the indicative timescales set out in the appendices are not fixed and may be extended where appropriate in order to support individuals to engage with services, access accommodation or address safeguarding needs. This flexibility is a key principle of the council's approach and reflects the complexity and vulnerability of many individuals living in encampments.

Phase 2 - Underway

- **Additional staffing capacity:** Recruitment of an additional Encampments Coordinator is underway to strengthen the council's ability to respond to increasing demand, improve consistency of

approach across services, and maintain effective oversight of complex or high-risk cases. The current operating model relies on a single officer coordinating activity across multiple services, landowners and partner agencies, supported by weekly operational and escalation meetings. Increasing this capacity will enable more proactive and timely case management, improve coordination across stakeholders, and strengthen service resilience and continuity, particularly during periods of heightened encampment activity.

- **Increased Vehicle Encampment Action:** Increased resources have been allocated to remove vehicle encampments. This element of the programme will be carefully targeted at locations where impacts are highest, and will generate learning on issues such as displacement, repeat activity and the effectiveness of enforcement as a deterrent.
- **Additional Traffic Regulatory Orders:** Increased resources for the introduction of additional Traffic Regulation Orders (TROs), subject to statutory consultation, have been allocated to reduce repeat vehicle encampments in known hotspot locations. TROs allow the council to restrict certain vehicle behaviours, including overnight stays, and to take enforcement action where breaches occur. TROs will be targeted and aligned with other measures, including enforcement and planned physical interventions.
- **Physical Works:** Physical works are being considered and delivered at locations that experience sustained seasonal pressure and recurring encampment activity.
- **Development of Recreational Camping Public Space Protection Orders (PSPOs):** The council has developed two new proposed Public Space Protection Orders (PSPOs) focused on addressing the impacts of recreational camping within the city. The first would address the use of tents and temporary camping structures in specified locations, and the second would address recreational overnight occupation of vehicles. The intention is to provide a proportionate enforcement framework for managing persistent environmental, community safety and public nuisance impacts associated with recreational camping, while ensuring that enforcement activity is not directed towards people who are homeless or sleeping rough, who will continue to be supported through established homelessness pathways and welfare-led interventions. Where enforcement is being considered, council officers will undertake site visits to understand individual circumstances and distinguish recreational camping from homelessness or rough sleeping, ensuring that the appropriate response is taken. Officers will engage with individuals, explain any applicable restrictions and provide information about lawful camping provision and alternative facilities available in the area before enforcement action is considered. Further details of the proposed PSPOs, including the rationale, scope and recommendations, are set out in a separate report being considered by Cabinet alongside this report.

Phase 3 – Extend Welfare Approach to Vehicle Encampments

3.9 In addition to the above improvements, the council will seek to further develop its welfare-first approach by extending this model to people living in vehicle encampments. At present, the outreach service and associated welfare provision are primarily focused on individuals identified as sleeping rough, including those living in tents, meaning that a significant cohort of people living in vehicles, some of whom have significant vulnerabilities, do not routinely receive the same level of support or engagement.

3.10 This proposal aligns with the planned re-procurement of the outreach service by Housing and Rough Sleeping Team, scheduled for 2027/28. This provides an opportunity to review the overall model, scope and delivery of outreach services, including how best to provide support for vehicle dwellers, and to ensure that services are delivered in the most effective and financially sustainable way. As part of this process, the council will seek to ensure best value for money through market engagement, service redesign and outcome-focused commissioning.

4 Analysis and consideration of alternative options

4.1 Alternative approaches have been considered in developing the proposals set out in Section 2 of this report. These include differing levels of enforcement, prevention and welfare provision.

- **Option 1: Immediate extension of welfare provision (not recommended)**
  Extending welfare support to vehicle dwellers at this stage. While this would improve consistency of approach with tent encampments, it is considered that better value for money and service effectiveness can be achieved by aligning this with the planned re-procurement of Housing and Rough Sleeping Team's outreach services in 2027.

  Option 2: Phased and balanced approach (recommended)
  This option (Phases 1, 2 and 3 described above), reflected in the recommendations at Section 2, builds on the Council's existing balanced approach to encampment management. It combines strengthened operational arrangements, targeted and proportionate enforcement, preventative measures, improved multi-agency coordination and continued welfare-led engagement with people experiencing homelessness and other vulnerabilities.

  The approach enables the Council to respond more effectively to the increasing complexity and scale of unauthorised encampments while ensuring compliance with its statutory duties and maintaining a welfare-first focus. It also provides a pragmatic and cost-effective route to further service improvement by aligning the development of enhanced support for people living in vehicle encampments alongside the planned recommissioning of

Housing's outreach services. This approach should maximise value for money, support stronger service integration and allow the Council to build on the operational improvements already underway.

Community engagement and consultation

5.1 The proposals have been shaped by extensive operational feedback from residents, members, visitors to the city and landowners / managers, including famers and the Diocese of Chichester. The need for clear and consistent communication with residents and businesses has been identified as a key requirement. Feedback from those living tent and vehicle encampments has also been used.

5.2 Engagement has also been undertaken with internal services, including Housing and Rough Sleeping Team, City Services, Legal Services and Community Safety, as well as street outreach providers (CGL) and operational teams involved in encampment management. Ongoing engagement with Sussex Police has informed the approach to legal powers, enforcement thresholds and partnership working.

5.3 Further consultation will be undertaken as required, particularly in relation to PSPO adoption for recreational camping and TRO implementation, which will follow statutory consultation processes.

6. Financial implications

6.1 The estimated cost of the Phase 2 improvement programme is £0.196m in 2026/27. The investment comprises the following elements:

- £0.050m for an additional Encampments Coordinator to strengthen operational capacity and improve coordination of the council's response to encampments. This has been identified and reported as an in-year overspend through TBM.

The following additional funding has been allocated as one-off investment from the Transformation Fund:

- £0.125m for vehicle removal, storage and associated enforcement activity.
- £0.010m for Traffic Regulation Orders and associated implementation costs.
- £0.015m for targeted physical prevention and site protection measures.

6.2 Ongoing funding for the additional Encampments Officer, together with the proposed extension of welfare provision to vehicle encampments, will be considered as part of the budget proposals to be determined by Budget Council in 2027.

Name of finance officer consulted: David Ellis Date consulted (15/07/26):

7. Legal implications

7.1 The council has a range of legal powers available to manage unauthorised encampments, including civil possession proceedings under Part 55 of the Civil Procedure Rules, the Criminal Justice and Public Order Act 1994 (Sections 77 and 78), Traffic Regulation Orders and byelaws. These powers apply in different circumstances. Part 55 is typically used for encampments on council land, while Sections 77 and 78 are primarily used in relation to occupied vehicles, particularly on the highway. The proposed approach does not prioritise one route over another, but supports more consistent and coordinated use of the most appropriate legal powers in each case, informed by evidence, proportionality and individual circumstances.

7.2 All enforcement activity must comply with the Human Rights Act 1998 and the Equality Act 2010, including the Public Sector Equality Duty. This requires the council to take into account the impact of its decisions on vulnerable individuals and groups, and to ensure that any interference with individuals' rights is proportionate, justified and supported by appropriate evidence. It is also noted that there is guidance produced by the Government. This strongly recommends limitations on the enforcement powers in particular to tent residents. For instance, a PSPO should not be used to make rough sleeping (as opposed to leisure camping) in tents unlawful. The PSPO and other remedies can target any linked ASB, but not the fact of being homeless in a tent in and of itself. Going beyond what is agreed in the current draft places the Council at risk of legal challenge.

7.3 The council's welfare-first approach is a significant strength and, for certain groups, an important element of ensuring legal compliance. It is also helpful to be able to demonstrate to a court the steps that have been taken to understand and address welfare needs before enforcement action is pursued. Undertaking welfare assessments and facilitating engagement with relevant support services should generally be considered before progressing enforcement action, as the outcomes may influence both the timing and nature of any intervention. However, a proportionate approach is required. There may be circumstances where welfare checks are unlikely to provide additional benefit, for example where there are significant safety concerns for staff or where individuals are already well known to services following repeated engagement and assessment. In such cases, it may be appropriate to proceed without further welfare checks, provided the rationale is clearly documented and the approach remains reasonable and proportionate. In such cases, it may be appropriate to proceed without further welfare checks, provided the rationale is clearly documented and the approach remains reasonable and proportionate. There is a clear judicial expectation that any policy be flexible to adapt to circumstances and not so rigid that individual circumstances are ignored.

7.4 The proposed development of a Public Space Protection Order (PSPO) is intended to provide an additional, proportionate tool to address specific

behaviours associated with recreational camping in defined locations. Any such PSPO must be supported by a robust evidence base, subject to consultation, and clearly targeted at behaviours that have a detrimental impact on public spaces. It cannot be used to criminalise homelessness or rough sleeping and must be designed to ensure compliance with equalities and human rights requirements.

7.5 Legal risk arises where enforcement action is taken without sufficient evidence, or where proportionality cannot be demonstrated, particularly in the context of limited alternative accommodation options. The approach set out in this report seeks to mitigate this risk through clear processes, consistent decision-making and strengthened coordination between services.

7.6 As is often the case there is a balance to be achieved, between the circumstances of those who live in bricks and mortar accommodation, residents and visitors accessing public spaces and those who for a variety of reasons find themselves not accommodated in ‘normal’ housing. This process will meet the legal tests and is a good fit for recognising the need to protect the property rights of the Council and by extension the residents, the needs of residents to be able to access and utilise public spaces and those who find themselves living in vehicles and tents. There is a fundamental difference between those who have accommodation available to them and those who do not.

Name of lawyer consulted: Simon Court Date consulted (17/07/2026):

8. Risk implications

8.1 The management of encampments presents a number of interrelated risks:

- There is a legal risk where enforcement action is taken without sufficient evidence or without demonstrating proportionality, particularly given the councils legal duties. This is mitigated through a welfare-first approach, clear processes and legal oversight.
- It should be noted that there is a risk that extended periods of toleration, could generate claims that an interest in land has been obtained. Brighton and Hove Council have experienced such claims previously, but successfully resisted them. This is an area of concern for legal.
- There is a risk of displacement, where enforcement or preventative measures move encampments to other parts of the city rather than resolving underlying issues. The proposed coordinated and phased approach is designed to mitigate this.
- A financial risk arises from the high costs associated with enforcement, particularly vehicle removal. Limiting activity to a targeted programme helps manage affordability and supports evidence-based future decisions.

- There are also operational and reputational risks, including capacity constraints and public expectations that may exceed legal powers. These are mitigated through improved coordination and clear communication.

The recommended phased approach reduces overall risk by enabling the council to test interventions, monitor impacts and adapt its approach based on evidence.

9. Equalities implications

9.1 Encampments can include individuals with protected characteristics under the Equality Act 2010, particularly in relation to disability, including mental health conditions and other complex needs. In addition, many individuals experience multiple disadvantage and vulnerability, which, while not a protected characteristic in itself, is relevant to the council's duties to act proportionately and to consider safeguarding impacts.

9.2 The council's welfare-first approach to tents reflects the need to balance enforcement with safeguarding and support. Any enforcement action must be proportionate and informed by welfare assessments.

9.3 It is noted that this group is hard to engage with but based in the information from officers those living in tents and vehicles are primarily (but not exclusively) white males. The causation of this is beyond the remit of this report. This group will also be protected under the Equality Act and going forward it would be of assistance to identify why this group represents a majority. Sexual orientation is not known, but it is not believed that the LGBTQ+ community are disproportionately represented. If future research is done all the Equalities issues could be more fully explored, but in any event the welfare approach as set out in this report is applicable to all and no detriment to any group is expected by use of this process.

10. Sustainability implications

10.1 Encampments can have environmental impacts including waste accumulation and damage to public spaces. The proposed measures, particularly improved management and targeted physical works, aim to mitigate these impacts while balancing wider sustainability considerations.

11. Health and Wellbeing Implications:

11.1 Encampments raise significant health and wellbeing issues for those living within them, often linked to homelessness, multiple and complex needs, and high levels of vulnerability. Individuals may experience poor physical health, mental ill health, and barriers to accessing services. The council's continued welfare-first approach supports engagement, promotes access to health and support services, and contributes to improved outcomes over time.

11.2 Improved management of encampments also supports the health and wellbeing of residents, businesses and communities by reducing environmental impacts, including waste, sanitation issues and damage to public spaces. A more coordinated and consistent approach helps to mitigate these impacts while maintaining a balanced response that considers both individual needs and wider community wellbeing.

Other Implications

12. Procurement implications

12.1 Procurement considerations relate to enforcement services, vehicle removal and physical works. These will be delivered in line with the council's procurement processes and social value objectives.

13. Crime & disorder implications:

13.1 Encampments can be associated with anti-social behaviour, environmental crime and wider community safety concerns, including noise nuisance, fly-tipping and impacts on public spaces. The council has a duty under section 17 of the Crime and Disorder Act 1998 to take reasonable steps to prevent crime and disorder across its functions.

13.2 The proposed approach strengthens the council's ability to meet these duties through improved coordination, targeted enforcement and more consistent use of legal powers. This includes the use of proportionate tools such as Community Protection Warnings and Notices, Traffic Regulation Orders and, where appropriate, other enforcement measures.

13.3 The continued welfare-first approach also supports longer-term crime prevention by addressing underlying vulnerability and promoting engagement with services, helping to reduce repeat issues and improve outcomes for individuals and communities.

14 Conclusion

14.1 Encampments present complex and increasing challenges for the city. The council has an established welfare-first approach for tents, but a more consistent and coordinated approach across tents and vehicles is required.

14.2 The work set out in this paper provides a proportionate and targeted set of actions to strengthen coordination, test increased enforcement, and address high-impact locations.

14.3 This approach enables the council to improve outcomes for individuals and communities while building the evidence base for future policy and investment decisions.

Supporting Documentation

1. Appendices

- Appendix 1: Tent Encampments – Operational Method Statement
- Appendix 2: Vehicle Encampments – Operational Method Statement

Appendix 1 and 2

Appendix 1: Tent Encampments – Operational Method Statement

Purpose

This appendix sets out the council's standard operational approach to managing tent encampments. It explains how cases are identified, how engagement and enforcement are undertaken, the legal routes available, and the indicative timescales involved. It is intended to provide transparency and ensure a consistent and proportionate approach across the city. These methods statements are provided as a framework, but are subject to change and adaptions, for example based on welfare need, resources available and community safety.

Key principles

The council's approach to tent encampments is based on the following principles:

- A **welfare-first approach**, recognising that many individuals are street homeless and have complex needs
- **Proportionate enforcement**, with legal action used where necessary and justified
- **Multi-agency working**, involving outreach services, housing, legal services and land managers

Process

Stage 1: Initial report and verification (Day 0–2)

Reports of tents are received and verified by council officers. Details are recorded and shared with outreach services to enable early engagement and support.

Stage 2: Initial welfare engagement and notice (Week 1)

A first visit is undertaken by the Encampments Coordinator and relevant land manager.

- A welfare check is completed
- Information is provided on housing options and support services
- A No Camping Notice is issued
  This stage prioritises engagement and establishing an understanding of individual circumstances.

Stage 3: Follow-up engagement (Week 2)

A second visit is undertaken if the tent remains.

- Further welfare engagement takes place

- Individuals are encouraged to access support
- A warning is provided that enforcement action may follow

Stage 4: Final visit and notice of intention (Week 3)

A third visit is undertaken.

- A final welfare check is completed
- A Notice of Intention to Remove is issued (typically allowing a short period before action)

Stage 5: Clearance or escalation

If the site is vacated, clearance is arranged.
If individuals remain, the case may be escalated to legal action by the relevant land manager.

Legal routes

Where voluntary resolution is not achieved, the council may use the following legal powers (or others as available / appropriate):

- **Civil possession proceedings (Part 55)** to recover land
- **Highways Act powers** where tents are causing obstruction or danger
- **Urgent legal action** where there are immediate risks to safety or serious anti-social behaviour
- **Other legal or enforcement routes as appropriate / available**

Indicative timeframe

- Welfare engagement process: typically up to 3 weeks
- Legal escalation: significant additional time depending on complexity and court availability

Flexibility

The council’s approach is welfare-led, and timescales are indicative rather than fixed.
They may be extended where individuals are engaging with services, where safeguarding issues are identified, or where there is a realistic prospect of moving individuals into accommodation or support. This flexibility is an important aspect of ensuring that enforcement action is proportionate and compliant with legal duties.

Appendix 2: Vehicle Encampments – Operational Method Statement

Purpose

This appendix sets out the council's standard approach to managing vehicle encampments. It explains the enforcement process, associated legal powers and indicative timescales, and how welfare considerations are incorporated at key stages.

Key principles

The approach to vehicle encampments is based on:

- **Proportionate enforcement**, reflecting the different legal framework applying to vehicles
- **Welfare considerations at key decision points**, particularly where enforcement is being considered
- **Targeted action**, focusing on locations with the highest impact

Process

Stage 1: Report and verification

Reports are received and logged. A process server or enforcement agent is instructed to verify occupancy and record vehicle details.

Stage 2: Service of notice (Section 77) or other appropriate notification of intent to commence legal proceedings as agreed by the officers

Where appropriate, a Section 77 notice (Criminal Justice and Public Order Act 1994), or other appropriate notification of intent to commence legal proceedings as agreed by the officers is issued requiring vehicles to leave. A welfare letter is also provided, offering information on support services.

Stage 3: Decision to escalate

If vehicles remain, the council reviews whether to escalate enforcement.
This involves:

- Assessment by officers and Legal Services
- Consideration of welfare factors and proportionality

Stage 4: Court application (Section 78) or other court application as is deemed most expedient to the situation.

Where escalation is justified, an application is made to the Magistrates' Court under Section 78 / or other court application as is deemed most expedient to the situation.
A court summons is served ahead of the hearing.

Stage 5: Court hearing and order

If granted, a court order requires vehicles to leave within a specified period.

Stage 6: Enforcement and removal

If vehicles do not comply, enforcement action is undertaken.
Vehicles may be removed, stored and ultimately disposed of if not reclaimed.

Legal routes

The main legal powers used are:

- **CJPOA 1994 Sections 77 and 78**
- **Traffic Regulation Orders** and parking enforcement where applicable
- Additional tools such as byelaws or PSPOs where proportionate and appropriate
- Part 55 of the Civil Procedure Rules
- In future potential PSPO's
- Community Protection Notices
- Other appropriate and available legal / enforcement tools

Indicative timeframe

- Notice to court application: approximately 2–4 weeks
- Court process to enforcement: additional time periods depending on court availability

Flexibility

Timescales are indicative and may be extended where appropriate. This includes where welfare concerns are identified, where individuals are engaging constructively with services, or where voluntary resolution is being pursued. This reflects the council's commitment to a balanced approach that combines enforcement with support.

Brighton & Hove City Council

Cabinet

Agenda Item 53

Subject: **WorkWell Programme**

Date of meeting: **Thursday, 17 September 2026**

Report of: **Cabinet Member for Children, Families and Youth Services**

Lead Officer: **Corporate Director for Families, Children and Wellbeing**

Contact Officer: **Carla Butler, Lisa Mitchell**

Email: Carla.Butler@brighton-hove.gov.uk
Lisa.mitchell@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key: Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000 and Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

1.1 This report seeks Cabinet approval for the council to enter into a Partnership Agreement with Surrey County Council to deliver the WorkWell Programme in the city. WorkWell is a national Department for Work & Pensions funded programme, commissioned through Integrated Care Boards, which will support residents whose health conditions or disabilities are affecting their ability to remain in, return to, or move towards work. The Department for Work and Pensions has appointed Surrey County Council as the Lead Accountable Body for WorkWell. Subject to this agreement, Brighton & Hove City Council will be responsible for delivering the WorkWell service to residents across the city.

1.2 Approval will enable the Council to claim up to £1.08m grant funding over three years and provide integrated work and health support to approximately 1,300 Brighton & Hove residents. The programme directly supports the Council Plan priorities, a fair and inclusive city, and a healthy city where people can thrive, by reducing health and economic inequalities and improving access to good work and tailored employment support.

2. Recommendations

2.1 Cabinet agrees with the council entering into a partnership agreement with Surrey County Council (the accountable body) to deliver the WorkWell Programme.

2.2 Cabinet delegates authority to the Corporate Director Families, Children and Wellbeing in consultation with the Cabinet member for Children, Families & Youth to progress the Partnership Agreement with Surrey County Council and any ancillary documents required for delivery of the WorkWell Programme.

3. Context and background information

3.1 WorkWell is a national early intervention programme funded by the Department for Work and Pensions. It is designed to support working age residents whose health condition or disability is affecting their ability to stay in work, return to work, or move towards work.

3.2 Funding for the programme will provide up to 12 weeks' person-centred support for residents who have lower-level health-related barriers to work. This includes people who are in work but struggling to remain well at work, people on sickness absence who may be at risk of leaving employment, and people who are out of work and need early support before their needs become more complex. Participants on the programme will be supported to complete a Work and Health Action Plan to address health and work barriers.

3.3 WorkWell responds to national and local priorities to reduce economic inactivity and improve health outcomes. It recognises that health, work, skills and wider support needs are closely linked, and that early help can prevent residents from falling further from employment.

3.4 The programme will be delivered across Surrey and Sussex through local partnerships between councils, health services and community partners. The Surrey and Sussex Integrated Care Board have entered into a funding agreement with the Department for Work and Pensions.

3.5 Surrey County Council has been appointed as the accountable body for the programme. To enable delivery in Brighton and Hove, it is proposed that Brighton & Hove City Council enter into a Partnership Agreement with Surrey County Council. This will allow the Council to claim agreed funding for local delivery by the council.

3.6 WorkWell is sited as key deliverable of the Get Sussex Working Plan (GSWP), overseen by the Growth Board. The GSWP was coproduced with stakeholders across the city and wider Pan-Sussex geography. It was endorsed by Cabinet and adopted by the Department for Work and Pensions in October 2025. The programme supports the government's ambitions to increase economic activity, respond to different place-based needs, and improve health and wellbeing outcomes. The GSWP will inform Sussex and Brighton Strategic Authority's Prosperity Strategy and Strategic Skills Plan.

3.7 The WorkWell Programme supports the Brighton and Hove Economic Plan 2024 - 2027 core imperative – to build a stronger, more inclusive labour market by ensuring that employability support is reaching areas of greatest inequality so that everyone who wants to work can do so. It also supports the Council Plan priorities by contributing to a fair and inclusive city and to a healthy city where people can thrive. It will help reduce health and economic inequalities by improving access to tailored work and health support for residents across Brighton and Hove.

3.8 A new team will be recruited to deliver the WorkWell Programme comprising of Programme Lead and Health and Health Coaches. WorkWell complements the Council's existing Connect to Work service, which supports residents with more complex barriers and priority groups into employment, including; refugees, homeless people, victims and survivors of domestic abuse and offenders or ex-offenders. The Council will deliver both programmes through the Skills and Employment Service which will enable ease of referral, make the best use of existing expertise, and provide a more joined-up offer for residents.

3.9 The Council's delivery costs will be reimbursed through claims to Surrey County Council, based on an agreed delivery plan and within the programme budget. Delivery will be monitored through a national framework model.

4. Analysis and consideration of alternative options

4.1 The recommended option is for the Council to enter into a Partnership Agreement with Surrey County Council and deliver WorkWell locally through the Skills and Employment Service. This would secure up to £1.08m of external funding over three years and support approximately 1,300 residents to access early work and health support.

4.2 The recommendation is made on the basis that WorkWell fills a clear gap in local provision. Existing national employment support funding is currently focused on Connect to Work, which supports residents with more complex barriers. Without WorkWell, there would be no comparable funded offer for residents with lower-level health-related barriers who need earlier support to remain in, return to, or move towards work.

4.3 The sole alternative option is not to enter into a Partnership Agreement with Surrey County Council. This is not recommended because there is no alternative route for the Council to draw down WorkWell funding. Residents in Brighton and Hove would lose access to the programme, and the funding and expected participant volumes may need to be reallocated elsewhere across Surrey and Sussex.

5. Community engagement and consultation

5.1 The Cabinet Member for Families, Children and Youth Services has been briefed on the WorkWell programme and its strategic contribution to improving health, wellbeing and employment outcomes through a coordinated partnership approach.

5.2 WorkWell has been discussed through established partnership governance structures, including the three Integrated Community Team (ICT) Leadership Forums. These forums bring together representatives from Brighton & Hove City Council, the voluntary, community and social enterprise (VCSE) sector, GP practices, Primary Care Networks, Community Pharmacy, and Sussex Community NHS Foundation Trust. The programme has also been presented to and endorsed by the Health and Wellbeing Board, ensuring alignment with the priorities and perspectives of elected members, health partners and the VCSE sector. This engagement has helped build collective

ownership and support across key stakeholders who will contribute to programme delivery and referral pathways.

5.3 WorkWell is designed to integrate health and employment support through a collaborative, person-centred approach. The Community Engagement Framework has not been used for formal consultation, as the WorkWell customer journey and delivery model are nationally prescribed. As a result, there is limited scope to influence the core service design through local consultation.

5.4 We will work closely with council teams including HR, Adult Social Care, housing prevention and public health to ensure join up and collaboration to support shared priorities.

5.5 We will work closely with external stakeholders, including Integrated Community Teams, Primary Care Networks, housing services, justice and probation partners, and VCSE organisations such as The Trust for Developing Communities (TDC) and Hangleton and Knoll Project, throughout the implementation phase and ongoing delivery of the programme. This collaborative approach will ensure effective and accessible referral pathways are established for residents facing barriers to participation, particularly those from communities experiencing the highest levels of inequality. By fostering strong partnership working across the health, employment, housing, justice and community sectors, we will provide coordinated, person-centred support that enables residents to access the right services at the right time, improving outcomes and reducing gaps in opportunity.

6. Financial implications

6.1 The WorkWell programme will be fully funded the Department for Work and Pensions. The council will claim its delivery costs from Surrey County Council who are the Accountable Body. The Council can claim up to £1.08m over 3 years. The programme will be managed within the approved budget envelope and monitored through existing financial controls to reduce the risk of underspending, delays, or spending outside the grant conditions. There is no financial risk to the Council's General Fund.

6.2 The programmes aim is to improve residents' long-term health and wellbeing outcomes, rather than directly helping people into work. Vital to increasing economic activity, health and wellbeing outcomes for residents.

Name of finance officer consulted: Hannah Birch. Date consulted (12/08/2026):

7. Legal implications

7.1 The Council will be required to enter into a Partnership Agreement with Surrey County Council to participate in the WorkWell Programme and access available funding. The agreement and any supporting documentation will be reviewed by legal services before it is finalised between the parties. Subject to completion of the agreement, there are no legal implications arising from the recommendations of this report.

7.2 Name of lawyer consulted: Manjinder Nagra Date consulted (13/08/26)

8. Risk implications

8.1 The principal risk is that, if the recommendation is not agreed, WorkWell cannot be implemented in Brighton and Hove within the planned timescales. This would mean residents would not benefit from early work and health support, and the Council would be unable to draw down the funding allocated for local delivery.

8.2 Not proceeding would also create a risk that the participant volumes and funding intended for Brighton and Hove are reallocated to other areas across Surrey and Sussex, subject to capacity. This could weaken the local work and health offer and create reputational risk with regional partners, health services and local stakeholders who have supported the development of the programme.

8.3 There are delivery risks if the recommendation is agreed, including the need to mobilise the service quickly, onboard and train staff, establish referral routes, and meet the programme requirements set by funders. These risks will be managed through the Council's existing Skills and Employment Service governance arrangements, clear project planning, regular monitoring and close working with Surrey County Council as the accountable body.

8.4 There is a financial and compliance risk if delivery costs, claims or performance do not align with the agreed programme requirements. This will be mitigated through established financial controls, regular claims monitoring, performance reporting, and oversight of delivery against the agreed partnership agreement and delivery plan.

9. Equalities implications

9.1 WorkWell will be available to all eligible residents across Brighton and Hove. The programme is expected to have a positive impact on equality by providing early, tailored support to people whose health condition or disability is affecting their ability to remain in, return to, or move towards work. The Council will work with Integrated Community Teams, Jobcentre Plus, health partners and the voluntary and community sector to promote access for residents who may experience greater health and economic inequalities.

9.2 The Department for Work and Pensions requires the Council to collect and report participant information, including age, ethnicity, address, disability status and educational attainment. This information will be used to monitor who is accessing the service and to identify any groups or areas that may be under-represented. Where gaps are identified, the Council will review and adapt its outreach and referral arrangements to improve access and maximise the programmes contribution to reducing health and economic inequality.

10. Sustainability implications

10.1 WorkWell will be delivered from existing council premises at Montague House. Using existing accommodation will avoid the need for additional premises and will make best use of the Council's current estate.

10.2 The service will use a mix of office-based, community-based and online support where appropriate. This flexible approach will reduce unnecessary travel for residents, staff and partners, while still enabling face-to-face support where this is needed.

10.3 The programme will use digital case management and communication systems wherever possible. This will help reduce paper use and other physical materials, while ensuring residents can still access information and support in appropriate formats when needed.

11. Health and Wellbeing Implications:

11.1 WorkWell will support health and wellbeing outcomes through the development of Work and Health Action Plans and referrals to public health services, support organisations and NHS services. WorkWell aligns with the theme of 'living well' as it is focused on supporting working age adults.

11.2 WorkWell provides an opportunity for collaboration across health and employment to support residents to make meaningful steps forward in their recovery.

12. Conclusion

12.1 Cabinet is recommended to approve the partnership agreement to enable implementation of WorkWell for the benefit of Brighton & Hove residents. The risks identified have clear mitigations and the approval of the recommendation will enable Brighton & Hove City Council to enter into a partnership agreement with Surrey County Council and secure up to £1.08 million of external funding over three years. The programme directly supports the Council's priorities for inclusion, health and wellbeing, and addresses economic inactivity through integrated health and employment support.

12.2 WorkWell fills an important gap in local provision by supporting residents with lower-level health-related barriers to work who are not eligible for existing programmes. It aligns with the Get Sussex Working Plan, complements the Council's Connect to Work service, and has strong support from local health and community partners. Delivery through the Council's existing Skills & Employment Service provides an efficient and cost-effective approach, maximising opportunities for joined-up support and positive outcomes for residents.

Brighton & Hove City Council

CABINET Agenda Item 54

Subject: **Public Space Protection Orders (PSPO) Permission to Renew, Extend and Adopt New**

Date of meeting: **Thursday, 17 September 2026**

Report of: **Cabinet Member for Children, Families and Youth Services**

Lead Officer: **Corporate Director for Families, Children and Wellbeing**

Contact Officer: **Nahida Shaikh**

Email: Nahida.Shaikh@Brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key: Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

1.1 This report seeks cabinet approval to:

A. renew existing Public Space Protection Orders (PSPOs) that have expired/ are due to expire;
B. extend some existing PSPOs; and
C. introduce new PSPOs to address identified and emerging issues of anti-social behavior and environmental harm in public spaces across Brighton & Hove.

1.2 The Council Plan sets out a mission for Brighton & Hove to be a city where people feel safe, included and welcome. PSPOs are one of the tools available to the Council to help deliver that mission by supporting safe, well-managed public spaces and addressing behaviours that negatively affect residents, businesses and visitors.

1.3 Under the Anti-social Behaviour, Crime and Policing Act 2014 (The Act), PSPOs can be in place for a maximum period of three years. Where a local authority considers that the statutory tests continue to be met, an Order may be renewed following appropriate consultation.

1.4 The statutory tests under section 59 of the Anti-social Behaviour, Crime and Policing Act 2014 requires that:

- Activities have had, or are likely to have, a detrimental effect on the quality of life of those in the locality.
- The effect is, or is likely to be, persistent or continuing in nature.
- The effect is, or is likely to be, unreasonable.
- The restrictions imposed are justified and proportionate to the identified issues.

2. Recommendations

2.1 Cabinet approves the renewal of existing PSPOs that have expired / are due to expire as set out in Appendix 1;

2.2 Cabinet approves to extend some existing Public Space Protection Orders as set out in Appendix 2; and

2.3 Cabinet approves adoption of new Public Space Protection Orders, as set out in Appendix 3, to address anti-social behaviours and/or activities following the satisfaction of the statutory tests.

2.4 Cabinet notes that two of the proposed new PSPOs, relating to restrictions on professional dog walkers in Blakers Park, and the launching and landing of drones on council land, require further consideration in light of the issues identified during the consultation. Accordingly, these measures are not recommended at this time.

3. Context and background information

3.1 Public Spaces Protection Orders (PSPOs) allow local authorities to impose proportionate and targeted restrictions on activities in public spaces where those activities have had, or are likely to have, a detrimental effect on the quality of life of those in the locality. PSPOs may in some cases include highway restrictions to limit access to some areas which may be affected by crime and antisocial behaviour. The terms and criteria for delivering a PSPO relating to Gated Public Spaces are laid out in section 64 of the Anti-social Behaviour, Crime and Policing Act 2014.

3.2 Brighton & Hove City Council had twelve PSPOs in place (please refer to Appendix 1) addressing issues including, but not limited to, alcohol-related anti-social behaviour, dog control, and gated public spaces.

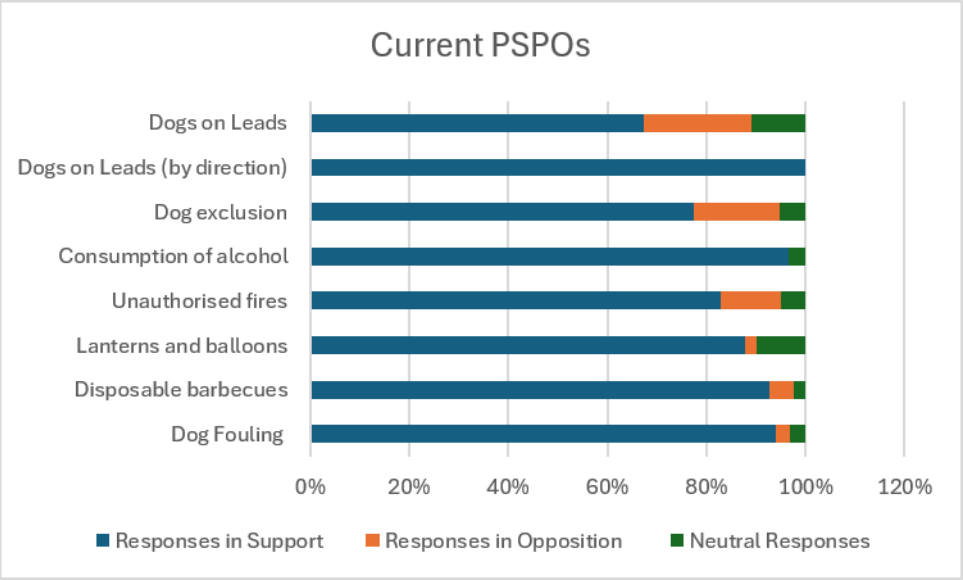
3.3 In addition, partners and Council services had identified emerging and changing patterns of behaviour which warranted consideration for the extension of four existing PSPOs (please refer to Appendix 2) or the adoption of six new PSPOs (please refer to Appendix 3), subject to consultation and satisfaction of the statutory tests.

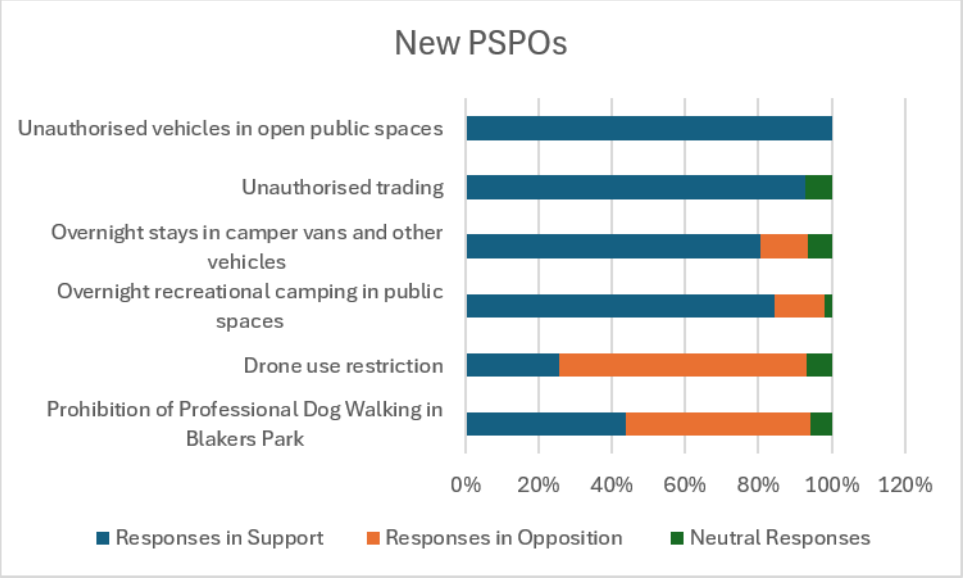
3.4 In June 2026 meeting, the Cabinet approved the undertaking of statutory consultation in relation to the proposed renewal of existing PSPOs; the potential extension of some existing PSPOs; and the potential introduction of new PSPOs to address anti-social behaviours and/or activities identified through evidence and partner intelligence.

3.5 Following Cabinet approval in June 2026, research, consultation and engagement has been completed and feedback from the consultation is set out in Appendices 4-5. A six-week public consultation was undertaken between 29 June and 7 August 2026 through the Your Voice Brighton &

Hove portal, alongside a separate statutory consultation on the renewal of six existing gated public space PSPOs.

3.6 The graphs below provide headline indicators from the consultation process showing exceptionally strong public support that all the current PSPOs and four out of the six new PSPOs proposed should be renewed and/ or adopted. The consultation responses and partnership information indicate the level of concern, potential risks, continued detrimental impact on residents, and continued support to place prohibitions and restrictions as necessary and proportionate to achieve desired impact.





3.7 The consultation results demonstrated that there is no clear mandate for the proposed measures around Professional Dog Walking restriction in Blakers Park and the restriction on launching and landing of drones on Council land. More respondents opposed the proposals than supported them across every question asked. Further evidence, impact, and work is required, and these specific PSPOs are not being put forward for approval by Cabinet currently.

3.8 The use of a £100 Fixed Penalty Notice was broadly supported across the consultation as a fair and proportionate enforcement measure for all PSPOs.

3.9 A smaller group of respondents favoured a more targeted and welfare-led approach to enforcement of PSPOs. This included distinguishing between responsible and harmful behaviour, such as camping compared with fly-camping, or isolated noise compared with persistent nuisance; using designated spaces and environmental improvements to reduce impact; and focusing action on hotspots and repeat breaches. This feedback will inform operational implementation and officer decision-making.

3.10 It should be noted that the proposed PSPOs will not disadvantage residents, including those who have expressed concerns or opposed specific measures, such as dog exclusion provisions. The dog exclusion PSPOs do not prevent dog owners from accessing or using parks altogether; rather, they designate limited areas where dog-free access is prioritised. The vast majority of park space remains available for responsible dog walking, ensuring that residents can continue to enjoy these spaces while balancing the needs of different user groups.

3.11 The existing PSPO Gating Schemes continue to provide effective protection against crime, antisocial behaviour, and associated community harm. While incidents within the gated areas have reduced, significant crime levels remain in the surrounding neighbourhoods, suggesting that removal of the restrictions could lead to a reoccurrence of these issues. Consultation feedback strongly supports renewal of the six existing schemes, with evidence demonstrating that the statutory tests continue to be met and that the schemes provide ongoing benefits to residents.

3.12 Following Cabinet approval and provided no legal challenge is made within the six-week period after approval, the PSPOs relating to the Gating Schemes will be formally sealed, published and implemented.

4. Analysis and consideration of alternative options

4.1 Cabinet has the option of not agreeing to the recommendations. This would result in existing PSPOs expiring and the Council losing associated enforcement powers. This presents a risk that significant and enduring levels of crime, antisocial behaviour and community harm would return to the affected areas, seriously impacting on the residents, their safety and quality of life. The evidential basis does not support losing a proven valuable intervention for existing PSPOs and widening this into other identified areas. This option is not recommended.

4.2 Alternatively, Cabinet can agree to the recommended PSPOs, enabling the Council to meet its statutory duties, reduce the impacts and harm from antisocial behaviour and crimes, and improve people's sense of safety and wellbeing. This is the recommended option.

5. Community engagement and consultation

5.1 An All-Member briefing took place on 7th July 2026 with further information sent after the meeting.

5.2 A six-week public consultation was undertaken on the Your Voice Brighton & Hove platform (29th June 2026 to 7th August 2026). This generated rich information about community experience, perceptions of safety, and expectations of statutory services. The volume of responses received for each of the PSPO is listed in the table below and evidences the breadth of engagement and strength of feelings on certain subjects.

PSPO	Responses	Status
Dog exclusion	1442	Current
Drone use restriction in Brighton & Hove	132	New
Prohibition of Professional Dog Walking in Blakers Park	153	New
Prohibition of unauthorised overnight stays in camper vans and other vehicles	62	New
Dogs on leads	46	Current
Single-use disposable barbecues, fires, lanterns, and balloons	41	Current
Dog Fouling	33	Current
Prohibition of unauthorised overnight recreational camping in public spaces	96	New
Dogs on leads by direction	22	Current
Consumption of Alcohol	29	Current
Prohibition of unauthorised vehicles in open public spaces	16	New
Prohibition of unauthorised trading	14	New

5.3 The online consultation sought views on:

- whether the existing PSPOs remain necessary and proportionate;
- the impact of the current Orders;
- whether any amendments and/or extensions are required; and
- whether there is support for the introduction of any new PSPOs.

5.4 Current PSPOS relating to Gated Public Spaces have different consultation requirements. For the six locations with existing PSPO (Gating Schemes) listed in the table below, research, consultation and engagement included:

- Site visits to meet residents and a pre-consultation engagement process to help evaluate the impact of the scheme and consider the need for any changes
- The proposal for renewal alongside a draft order was placed on the Council website, posted to each address in the affected area and attached to each of the affected gates for a 28-day period.
- The proposal for renewal and the draft orders were circulated to key statutory and other stakeholders including Sussex Police, the Police & Crime Commissioner, Ward councilors and the

Current PSPO / Renewal of Gating Schemes
Brunswick Row PSPO
Farman Street PSPO
Nelson Row PSPO
Oxford Court PSPO
Pool Passage PSPO
St James's Court PSPO

MP for the location, Community Cohesion, and Environmental Services in the council.

5.5 The consultation approach was proportionate, accessible and inclusive, and captured a broad range of views. Additional engagement activities were adopted as appropriate to each PSPO. All public inquiries were directed at the consultation.

6. Financial implications

6.1 No financial implications in delivering the recommendations of this report.

Name of finance officer consulted: David Ellis Date consulted 07 September 2026

7. Legal implications

7.1 The consultation responses have been carefully considered, and no matters have been identified that would undermine the Council's conclusion that the statutory conditions for making, renewing or extending the PSPOs are met.

Name of lawyer consulted: Simon Court Date consulted: 24 August 2026

8. Risk implications

8.1 Enforcement of PSPOs effectively and transparently is important to maintain communities' confidence and trust in the tools and powers and will contribute to upholding the Council's reputation as an anti-racist, fair and inclusive, welcoming place maker and leader.

9. Equalities implications

9.1 Due regard has been given to the equality duty in drawing up the recommendations including mitigation to reduce adverse impacts, if any. The recommendations and their implementation do not have significant equality implications. No equality or accessibility concerns were raised during the consultation, and alternative routes remain available where relevant. (please also see the Appendix 5).

10. Sustainability implications

10.1 No significant implications have been identified.

11. Health and Wellbeing Implications:

11.1 In seeking to address significant and ongoing antisocial behaviour, neighbourhood issues, and harms, this proposal supports the public health and wellbeing of residents by addressing an ongoing effect on their health, wellbeing, and safety.

Other Implications

12. Procurement implications

12.1 This activity does not involve any procurement and has no procurement implications.

13. Crime & disorder implications:

13.1 PSPOs are one of a range of tools available to the Council and its partners to address anti-social behaviour and support community safety and cohesion. They support crime reduction, better enable positive policing and offer protection to residents and businesses by addressing crime and antisocial behaviour which is having an impact on their quality of life.

14. Conclusion

14.1 The available information gathered through stakeholder engagement, and public consultation demonstrates that the anti-social behaviours identified within the proposed PSPO area have had, or are likely to have, a detrimental impact on the quality of life of those living in, working in or visiting affected areas. The proposed restrictions are considered reasonable, proportionate, and necessary to prevent the continuation of these behaviours, to protect the rights of the wider community, and to support the Council's wider objectives of maintaining safe, welcoming, and accessible public spaces.

14.2 The introduction, renewal and variation/ extension of the PSPO will provide the Council and partner agencies with an additional tool to address persistent issues. This will enable the Council to continue taking a lawful, transparent, proportionate, and evidence-based approach to the prevention and reduction of antisocial behaviour, crime, and associated harm. Cabinet is therefore requested to approve the recommendations set out in this report.

Current PSPO	**Recommendation**
Single-use disposable barbecues, lanterns and balloons Public Spaces Protection Order	Renew PSPO
Consumption of alcohol Public Spaces Protection Order	Renew PSPO
Dog Fouling Public Spaces Protection Order	Renew PSPO
Dogs Exclusion Public Spaces Protection Order	Renew PSPO
Dogs on Leads (By Direction) Public Spaces Protection Order	Renew PSPO
Dogs on Leads Public Spaces Protection Order	Renew PSPO
Current PSPOs– Gated Public Schemes	**Recommendation**
Pool Passage Public Spaces Protection Order	Renew PSPO
St James's Court Public Spaces Protection Order	Renew PSPO
Oxford Court Public Spaces Protection Order	Renew PSPO

Farman Street Public Spaces Protection Order	Renew PSPO
Brunswick Row Public Spaces Protection Order	Renew PSPO
Nelson Row Public Spaces Protection Order	Renew PSPO

Current PSPOs -	Extension	Recommendation
Single-use disposable barbecues, lanterns and balloons PSPO	Add an additional prohibition of lighting an unauthorised fire	Extend PSPO
Dog Fouling PSPO	To remove the exception of BHCC agricultural land and extend the prohibition to these areas.	Extend PSPO
Dogs Exclusion PSPO	To extend to Blakers park fenced area and Preston Park Velodrome and cricket pitch	Extend PSPO
Dogs on Leads PSPO	To remove the exception of BHCC agricultural land and extend the prohibition to these areas	Extend PSPO

Potential New PSPO	Recommendation
Prohibition of Unauthorised Overnight Recreational Camping in Public Spaces	Adopt PSPO
Prohibition of Unauthorised Overnight Recreational Stay in Campers or Vehicles adapted to be Lived In.	Adopt PSPO
Prohibition of the Entry of Unauthorised Vehicles in Open Public Spaces	Adopt PSPO
Prohibition of Unauthorised Trading	Adopt PSPO
Prohibition of Unauthorised Drones – Launching from and Landing on the Council Land	Not Recommended for Adoption – Further Work Required
Prohibition of Professional Dog Walking in Blakers Park	Not Recommended for Adoption – Further Work Required

Supporting Documentation

1. Appendices

1. Recommendations on Renewal of Current PSPOs
2. Recommendations on Extension of Current PSPOs
3. Recommendations on Adoption of Current PSPOs
4. PSPOs Consultation Responses Report
5. PSPOs Gated Public Spaces Schemes Consultation Responses

Appendix 1: Recommendations On Renewal Of Current PSPOs (12) Including Gating Schemes

PSPO	Date Adopted	Expiring	Link	Recommendation
Single-use disposable barbecues, lanterns and balloons Public Spaces Protection Order	04 August 2022	04 August 2025	Single-use disposable barbecues, lanterns and balloons Public Spaces Protection Order	Renew PSPO
Consumption of alcohol Public Spaces Protection Order	19 October 2023	19 October 2026	Consumption of alcohol Public Spaces Protection Order	Renew PSPO
Dog Fouling Public Spaces Protection Order	19 October 2023	19 October 2026	Dog Fouling Public Spaces Protection Order 2023	Renew PSPO
Dogs Exclusion Public Spaces Protection Order	19 October 2023	19 October 2026	Dogs Exclusion Public Spaces Protection Order 2023	Renew PSPO
Dogs on Leads (By Direction) Public Spaces Protection Order	19 October 2023	19 October 2026	Dogs on Leads (By Direction) Public Spaces Protection Order 2023	Renew PSPO
Dogs on Leads Public Spaces Protection Order	15 November 2023	15 November 2026	Dogs on Leads Public Spaces Protection Order 2023	Renew PSPO

PSPO	Date Adopted	Expiring	Link	Recommendation
Pool Passage Public Spaces Protection Order	01 October 2022	01 October 2025	Pool Passage Public Spaces Protection Order	Renew PSPO
St James's Court Public Spaces Protection Order	19 October 2023	19 October 2026	St James's Court Public Spaces Protection Order (PSPO) 2023	Renew PSPO

Oxford Court Public Spaces Protection Order	19 October 2023	19 October 2026	Oxford Court Public Spaces Protection Order (PSPO) 2023	Renew PSPO
Farman Street Public Spaces Protection Order	19 October 2023	19 October 2026	Farman Street Public Spaces Protection Order (PSPO) 2023	Renew PSPO
Brunswick Row Public Spaces Protection Order	19 October 2023	19 October 2026	Brunswick Row Public Spaces Protection Order (PSPO) 2023	Renew PSPO
Nelson Row Public Spaces Protection Order	22 February 2024	22 February 2027	Nelson Row Public Spaces Protection Order (PSPO) 2024	Renew PSPO

Appendix 2: Recommendations On Potential Extensions Of PSPOS (4)

PSPO	Extension of Prohibitions		Recommendation
Single-use disposable barbecues, lanterns and balloons PSPO	Add an additional prohibition of lighting an unauthorised fire.		Extend PSPO
PSPO	**Current Geographic Coverage**	**Proposed Geographic Extension**	
Dog Fouling PSPO	All BHCC land which is open to the air and which the public are entitled or permitted to have access to, except for land that is used for agriculture, woodland or Forestry Commission land.	To remove the exception of BHCC agricultural land and extend the prohibition to these areas.	Extend PSPO
Dogs Exclusion PSPO	All BHCC Children's Play Areas at any time (children's play areas enclosed by fencing that contain play equipment) Borough Cemetery Lewes Road, Extra Mural Cemetery Lewes Road, Borough Cemetery Bear Road, The Jewish Cemetery Bear Road, Meadowview and Lawn Cemetery Bear Road, Hove Cemetery North & South Old Shoreham Road and Portslade Cemetery Victoria Road. Prohibition in force at all times except for people attending funerals, remembrance services or visiting graves, or people who reside in the premises of cemeteries, under which circumstances dogs must be kept on leads at all times.	To extend to Blakers park fenced area and Preston Park Velodrome and cricket pitch	Extend PSPO

	Parks & Gardens at any times, specifically: Brunswick Square Norfolk Square Russell Square Bedford Square Clarence Square Powis Square Pelham Square Regency Square (North End) New Steine Square Steine Memorial Gardens Kipling Gardens Rottingdean The Rockery Gardens Preston Road William Clarke Park Picton Street Saunders Park excluding the fenced dog area to the South West corner of the park Beaches (including the foreshore) from May to September with the **exclusion** of the following beaches displaying a “dog friendly” sign: The beach between Longridge Avenue and the border Beaches between Chailey Avenue and Arundel Drive West Rottingdean Beaches between West Marina Wall to Rottingdean Slope Beaches between the West Wall of Brighton Marina and up to the Volks Railway Station opposite New Steine.		
Dogs on Leads PSPO	All roads in the BHCC area, including the upper and lower Seafront promenades with the exception of except for land that is used for agriculture, woodland or Forestry Commission land.	To remove the exception of BHCC agricultural land and extend the prohibition to these areas	Extend PSPO

Appendix 3: Recommendations On Adoption Of Potential New PSPOS (6) – Adoption Recommended (4), Further Work Required/ Not Recommended (2)

Potential PSPO	Location	Detail	Recommendation
Prohibition of Unauthorised Overnight Recreational Camping in Public Spaces	Across all council land in the city	To specifically target recreational camping and exclude any targeting/prohibition of people who are homeless/rough sleeping.	Adopt PSPO
Prohibition of Unauthorised Overnight Recreational Stay in Campers or Vehicles adapted to be Lived In.	Across all council land in the city	Issue on multiple parks including Regency Square as an example. By issuing across all areas, it prevents displacement/ moving from one park to another.	Adopt PSPO
Prohibition of the Entry of Unauthorised Vehicles in Open Public Spaces	Council parks and open spaces including woodlands.	Vehicles driving on parks land, risk to pedestrians, churn and compaction of grassland and impact on legitimate businesses. Issue on multiple parks including Hove Park as an example. By issuing across all areas, it prevents displacement / moving from one park to another.	Adopt PSPO

Prohibition of Unauthorised Trading	Council parks and open spaces including woodlands vehicles driving on parks land, risk to pedestrians, churn & compaction of grassland & impact on legitimate businesses.	Issue on multiple parks including Hove Park and Blakers Park as an example. By issuing across all areas, it prevents displacement / moving from one park to another.	Adopt PSPO
Prohibition of Unauthorised Drones – Launching from and Landing on the Council Land	Across all council parks and public open spaces, in line with CAA guidance on the restriction on the flying of drones.	History across the country of this being an issue and unsafe in a children's recreation environment	Not Recommended
Prohibition of Professional Dog Walking in Blakers Park	Blakers Park	Prohibition of Professional Dog Walking in Blakers Park	Not Recommended

Appendix 4: Public Spaces Protection Orders (PSPOs) Consultation Responses

A Note On Consultation

Consultation Period: 29 June 2026 to 07 August 2026

The online public consultation ran for 6 weeks via Your Voice Brighton & Hove Portal.

Please note that the PSPOS Gated Public Spaces has different consultation requirements, and the responses can be found at Appendix 5.

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Single-Use Disposable Barbecues, Fires, Lanterns And Balloons: Consultation Response

Total responses analysed: 41 | 6 weeks online consultation period: 29 June 2026 to 07 August 2026

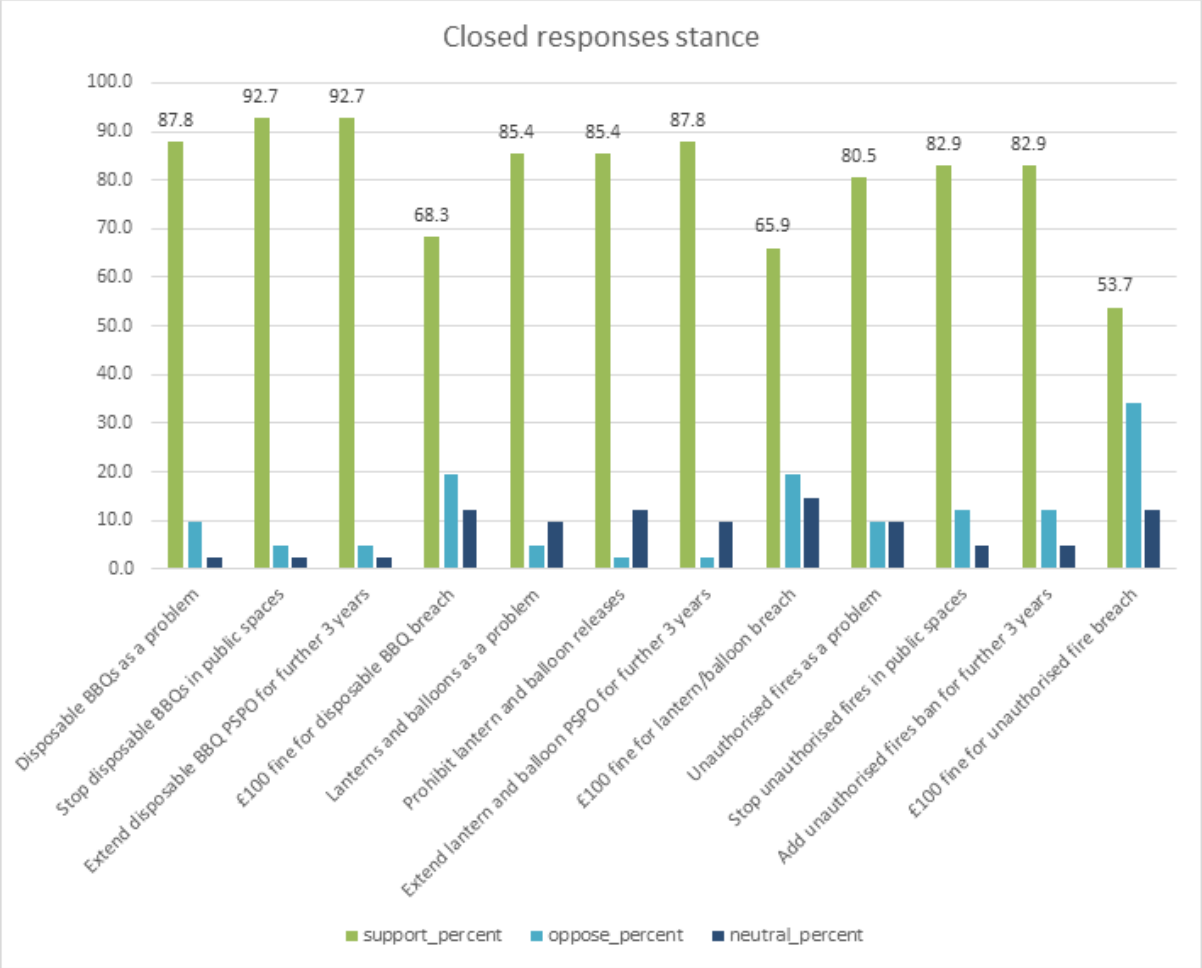
Summary

- 41 consultation responses have been received.
- 36 respondents (87.8%) agreed or strongly agreed that single-use disposable barbecues in public spaces are a problem, and 38 (92.7%) agreed or strongly agreed that the council should stop their use.
- 38 respondents (92.7%) agreed the disposable barbecue PSPO should be extended for a further 3 years, while 28 (68.3%) agreed that a £100 fine is fair.
- 35 respondents (85.4%) agreed or strongly agreed that lanterns and balloon releases are a problem, and 35 (85.4%) agreed or strongly agreed that the council should prohibit releases.
- 33 respondents (80.5%) agreed or strongly agreed that unauthorised fires are a problem, and 34 (82.9%) agreed or strongly agreed the council should stop unauthorised fires.

Closed response results

Question	Valid responses	Support / agree	Support %	Oppose / disagree	Oppose %	Neutral / unsure
BBQ1: Disposable BBQs as a problem	41	36	87.8%	4	9.8%	1 (2.4%)
BBQ2: Stop disposable BBQs in public spaces	41	38	92.7%	2	4.9%	1 (2.4%)
BBQ3: Extend disposable BBQ PSPO for further 3 years	41	38	92.7%	2	4.9%	1 (2.4%)

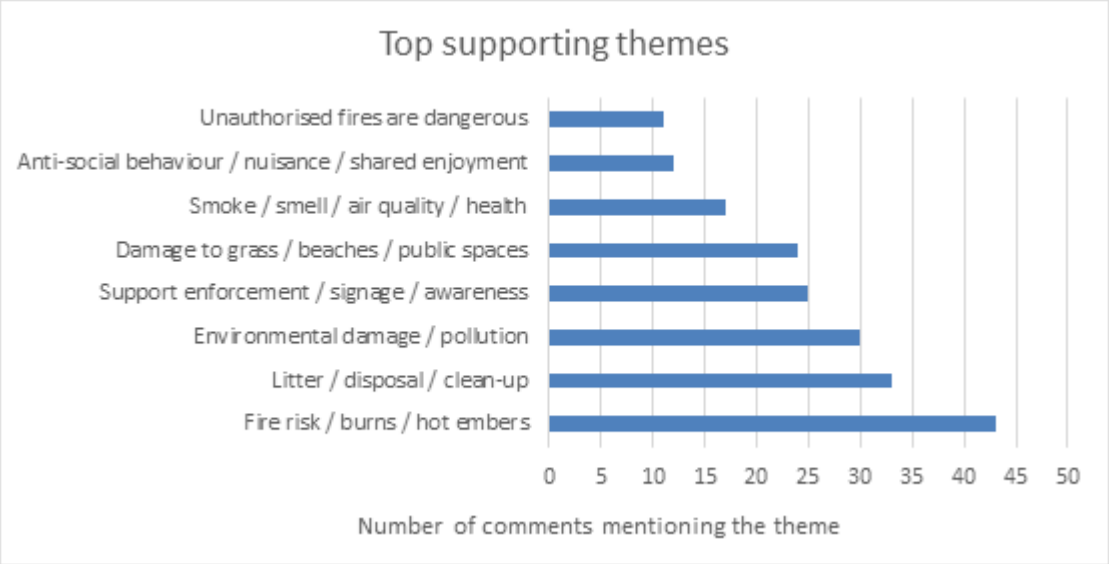
BBQ4: £100 fine for disposable BBQ breach	41	28	68.3%	8	19.5%	5 (12.2%)
LB1: Lanterns and balloons as a problem	41	35	85.4%	2	4.9%	4 (9.8%)
LB2: Prohibit lantern and balloon releases	41	35	85.4%	1	2.4%	5 (12.2%)
LB3: Extend lantern and balloon PSPO for further 3 years	41	36	87.8%	1	2.4%	4 (9.8%)
LB4: £100 fine for lantern/balloon breach	41	27	65.9%	8	19.5%	6 (14.6%)
FIRE1: Unauthorised fires as a problem	41	33	80.5%	4	9.8%	4 (9.8%)
FIRE2: Stop unauthorised fires in public spaces	41	34	82.9%	5	12.2%	2 (4.9%)
FIRE3: Add unauthorised fires ban for further 3 years	41	34	82.9%	5	12.2%	2 (4.9%)
FIRE4: £100 fine for unauthorised fire breach	41	22	53.7%	14	34.1%	5 (12.2%)



Main qualitative themes

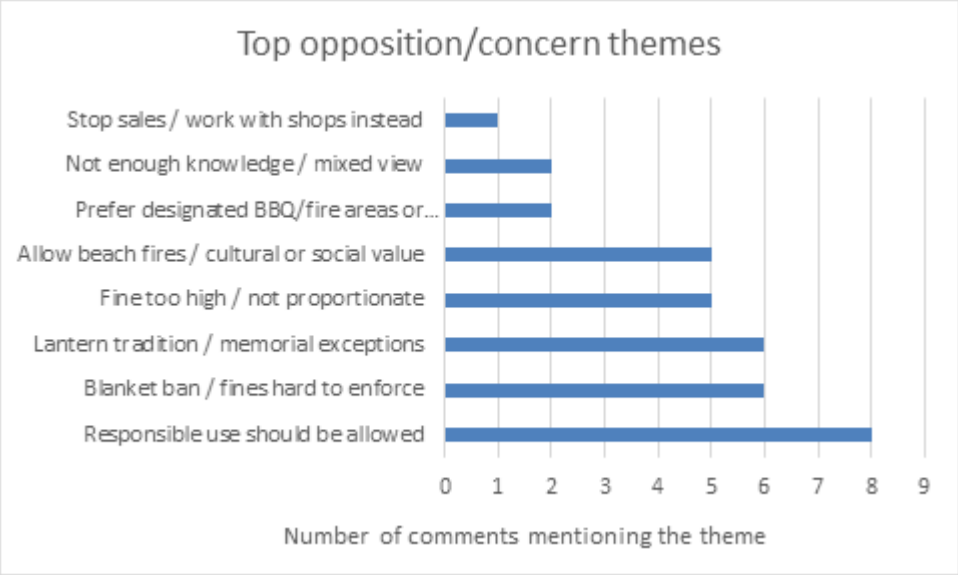
Themes supporting restrictions

Theme	Comments mentioning theme[i]*
Fire risk / burns / hot embers	43
Litter / disposal / clean-up	33
Environmental damage / pollution	30
Support enforcement / signage / awareness	25
Damage to grass / beaches / public spaces	24
Smoke / smell / air quality / health	17
Anti-social behaviour / nuisance / shared enjoyment	12
Unauthorised fires are dangerous	11



Themes opposing or raising concerns about restrictions

Theme	**Comments mentioning theme***
Responsible use should be allowed	8
Blanket ban / fines hard to enforce	6
Lantern tradition / memorial exceptions	6
Fine too high / not proportionate	5
Allow beach fires / cultural or social value	5
Prefer designated BBQ/fire areas or infrastructure	2
Not enough knowledge / mixed view	2
Stop sales / work with shops instead	1



Summary of qualitative feedback

Supportive feedback most often focuses on fire risk, burns, hot embers and the risk of wider fire spreading in dry conditions. Disposable barbecues are also described as causing litter, unsafe disposal, burned grass, smoke, unpleasant smells, air pollution and damage to shared public spaces.

For lanterns and balloons, the strongest supportive themes are environmental harm, litter, wildlife risk and uncontrolled fire risk from lanterns. Respondents describe balloon and lantern releases as avoidable pollution which can return to land or sea as debris.

For unauthorised fires, respondents focus on wildfire risk, damage to grass, trees and habitats, smoke and safety risks for families, older people, people with respiratory conditions and other users of public spaces.

The main concerns are about enforcement, signage and whether fines are the best approach. Some respondents prefer designated barbecue or fire areas, safe disposal facilities, working with shops to discourage sales, and exceptions for controlled or contained fires in appropriate locations.

Respondent profile

Respondent type	Count	Percent
Resident of Brighton & Hove	41	100.0%

Ward profile

Ward	Count	Percent of all responses

Preston Park	5	12.2%
Central Hove	4	9.8%
Kemptown	4	9.8%
Regency	3	7.3%
Patcham & Hollingbury	2	4.9%
Westdene & Hove Park	2	4.9%
Goldsmid	2	4.9%
Hanover & Elm Grove	2	4.9%
West Hill & North Laine	2	4.9%
Brunswick & Adelaide	2	4.9%
Rottingdean & West Saltdean	1	2.4%
Hollingdean & Fiveways	1	2.4%
North Portslade	1	2.4%
Wish	1	2.4%

Conclusion and Recommendations.

The consultation demonstrates strong public support for the continuation of the disposable barbecue PSPO and for measures to prohibit lantern and balloon releases and extending these measures to unauthorised fires. Support levels exceeded 80% across all key proposals, indicating broad agreement that these activities present a problem and should be restricted in public spaces.

Based on the consultation responses received, there is strong support for continuing and strengthening the proposed restrictions, that is, varying the PSPO to include lighting of unauthorised fire.

Consumption Of Alcohol: Consultation Response

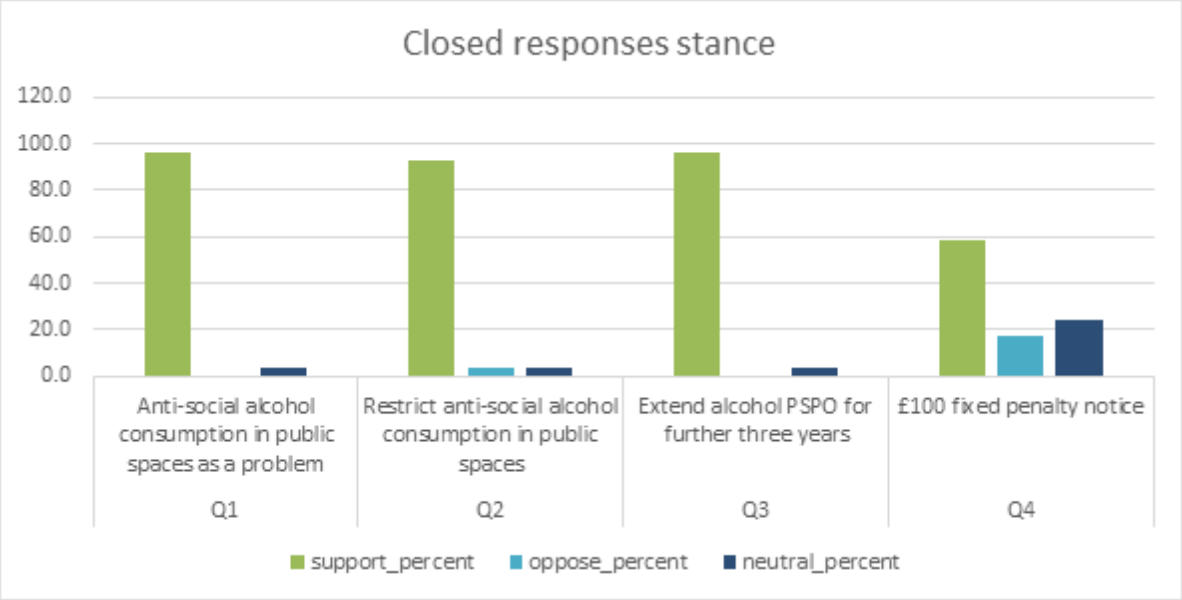
Total responses analysed: 29

Summary

- 29 consultation responses have been received.
- 28 respondents (96.6%) agreed or strongly agreed that anti-social alcohol consumption in public spaces is a problem, while 0 (0.0%) disagreed or strongly disagreed.
- 27 respondents (93.1%) agreed or strongly agreed that the council should restrict anti-social alcohol consumption in parks, open spaces and on the seafront.
- 28 respondents (96.6%) agreed that the PSPO should be extended for a further 3 years.
- 17 respondents (58.6%) agreed that a £100 fine is proportionate, while 5 (17.2%) disagreed.

Closed response results

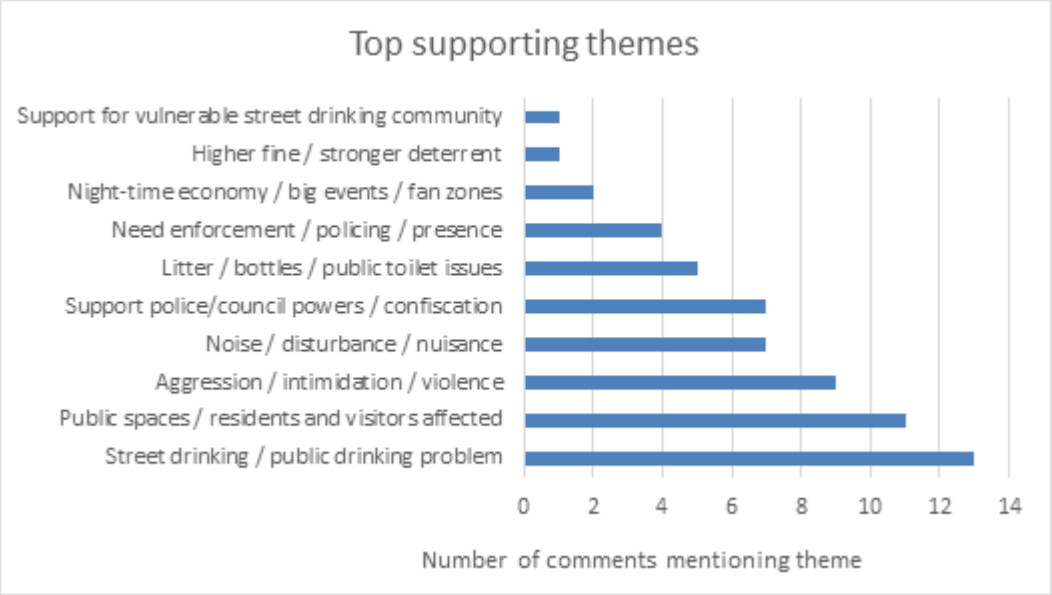
Question	Valid responses	Support / agree	Support %	Oppose / disagree	Oppose %	Neutral / unsure
Q1: Anti-social alcohol consumption in public spaces as a problem	29	28	96.6%	0	0.0%	1 (3.4%)
Q2: Restrict anti-social alcohol consumption in public spaces	29	27	93.1%	1	3.4%	1 (3.4%)
Q3: Extend alcohol PSPO for further three years	29	28	96.6%	0	0.0%	1 (3.4%)
Q4: £100 fixed penalty notice	29	17	58.6%	5	17.2%	7 (24.1%)



Main qualitative themes

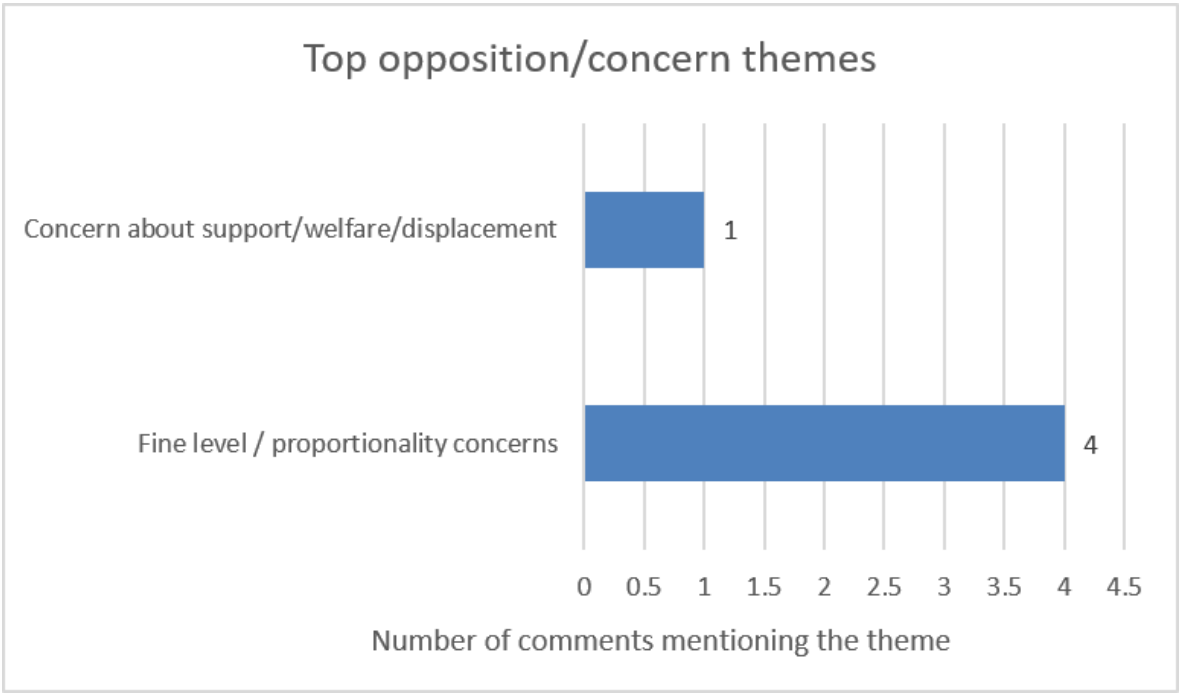
Themes supporting restrictions

Theme	Comments mentioning theme*
Street drinking / public drinking problem	13
Public spaces / residents and visitors affected	11
Aggression / intimidation / violence	9
Noise / disturbance / nuisance	7
Support police/council powers / confiscation	7
Litter / bottles / public toilet issues	5
Need enforcement / policing / presence	4
Night-time economy / big events / fan zones	2



Themes opposing or raising concerns about restrictions

Theme	Comments mentioning theme*
Fine level / proportionality concerns	4
Concern about support/welfare/displacement	1



Summary of qualitative feedback

Supportive responses were primarily driven by concerns about anti-social behaviour linked to public alcohol consumption. Respondents frequently referred to aggression, intimidation, excessive noise, nuisance, vandalism, harassment, and groups of street drinkers whose behaviour makes some areas feel unsafe.

Many respondents highlighted the impact on residents, visitors and the wider night-time economy. Common issues included late-night disturbance, littering from cans and bottles, public urination, and increased demand on police, ambulance and security services.

There was strong support for the PSPO as a practical enforcement tool, particularly where it enables police and authorised officers to require the surrender of alcohol when behaviour is causing problems. However, respondents repeatedly stressed the importance of effective enforcement, including a visible police and PCSO presence. Some also called for the restrictions to be applied more widely, covering streets, benches and other public spaces in addition to parks, open spaces and the seafront.

The main concerns raised related to proportionality and support. While some respondents felt that a £100 fixed penalty notice may not be a sufficient deterrent, others noted that people experiencing homelessness or those within the street drinking community may be unable to pay fines. These respondents emphasised the need for enforcement to be accompanied by appropriate support and referral pathways to address underlying needs.

Respondent profile

Respondent type	**Count**	**Percent**
Resident of Brighton & Hove	27	93.1%
A local stakeholder	2	6.9%

Ward profile

Ward	**Count**	**Percent of all responses**
Preston Park	4	13.8%
Kemptown	3	10.3%
Hanover & Elm Grove	2	6.9%
Brunswick & Adelaide	2	6.9%
Goldsmid	2	6.9%

Regency	2	6.9%
Central Hove	1	3.4%
West Hill & North Laine	1	3.4%
Woodingdean	1	3.4%
Westbourne & Poets' Corner	1	3.4%

Conclusion and Recommendation

Overall, the consultation responses indicate strong public support for renewing the PSPO and provide evidence that anti-social behaviour associated with public alcohol consumption continues to have a detrimental effect on the quality of life of those who live in, work in and visit the city. Respondents consistently described behaviour such as intimidation, harassment, noise, littering, vandalism and public urination, alongside concerns about community safety and the impact on public services.

While respondents emphasised the need for proportionate enforcement and appropriate support for vulnerable individuals, the evidence suggests that the PSPO remains a reasonable and justified measure to help prevent persistent and unreasonable anti-social behaviour in public spaces. Taken together, the responses support the view that the statutory test for a PSPO continues to be met, and that renewal of the Order is likely to contribute to protecting the local community from activities that have a detrimental effect on quality of life.

Dog Fouling: Consultation Response

Total responses analysed: 33

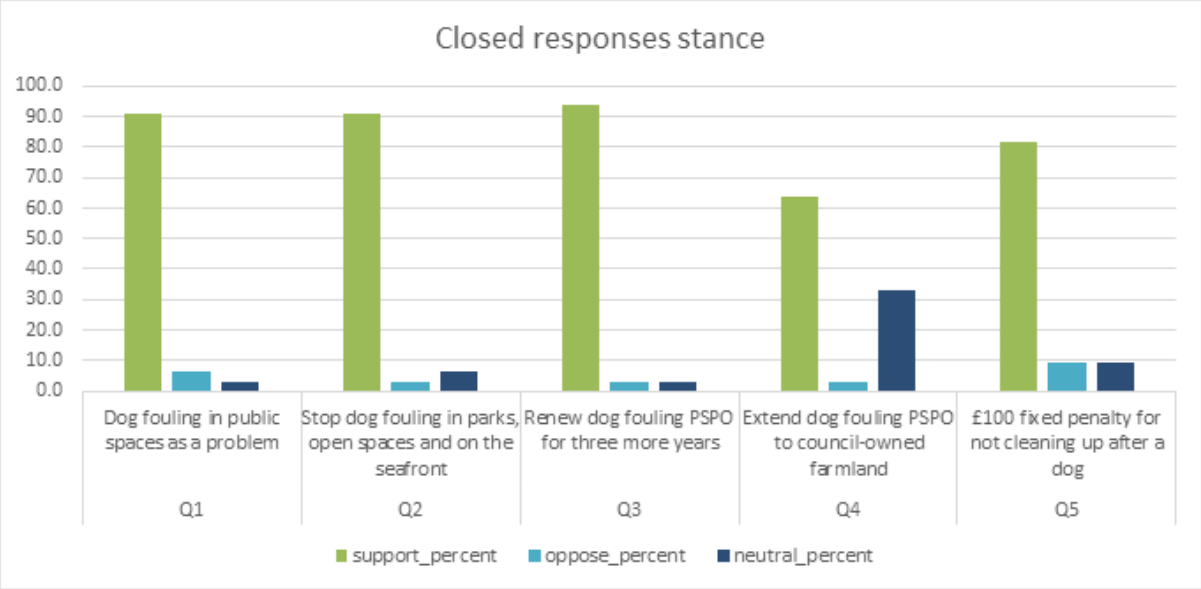
Summary

- 33 consultation responses have been received.
- 30 respondents (90.9%) agreed or strongly agreed that dog fouling in public spaces is a problem, while 2 (6.1%) disagreed or strongly disagreed.
- 30 respondents (90.9%) agreed or strongly agreed that the council should stop dog fouling in parks, open spaces and on the seafront, while 1 (3.0%) disagreed or strongly disagreed.
- 31 respondents (93.9%) agreed that the dog fouling PSPO should be renewed for 3 more years, while 1 (3.0%) disagreed.
- 21 respondents (63.6%) agreed that the PSPO should extend to council-owned farmland, and 27 (81.8%) agreed that a £100 fixed penalty is fair.

Closed response results

Question	Valid responses	Support / agree	Support %	Oppose / disagree	Oppose %	Neutral / unsure
Q1: Dog fouling in public spaces as a problem	33	30	90.9%	2	6.1%	1 (3.0%)
Q2: Stop dog fouling in parks, open spaces and on the seafront	33	30	90.9%	1	3.0%	2 (6.1%)
Q3: Renew dog fouling PSPO for three more years	33	31	93.9%	1	3.0%	1 (3.0%)
Q4: Extend dog fouling PSPO to council-owned farmland	33	21	63.6%	1	3.0%	11 (33.3%)
Q5: £100 fixed penalty for not	33	27	81.8%	3	9.1%	3 (9.1%)

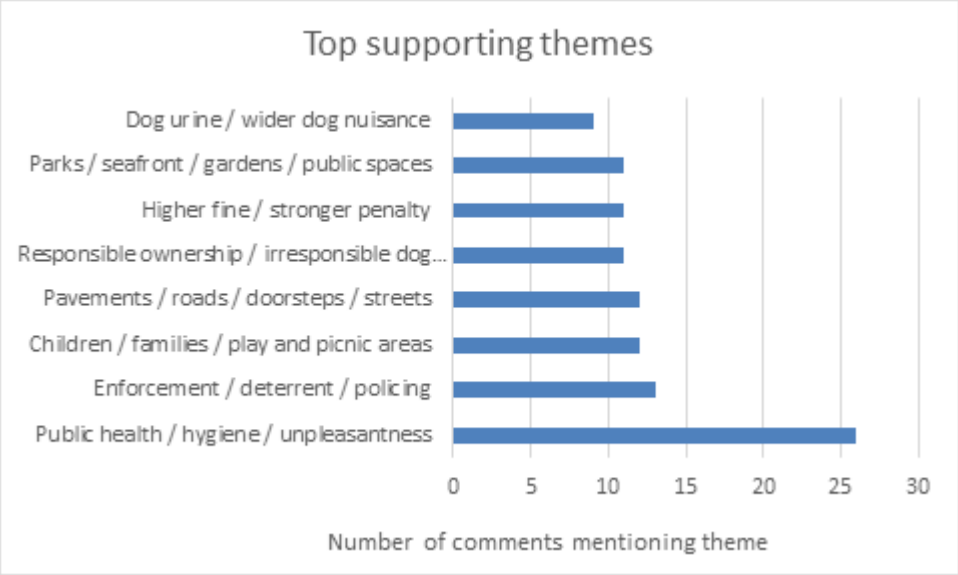
cleaning up after a dog						



Main qualitative themes

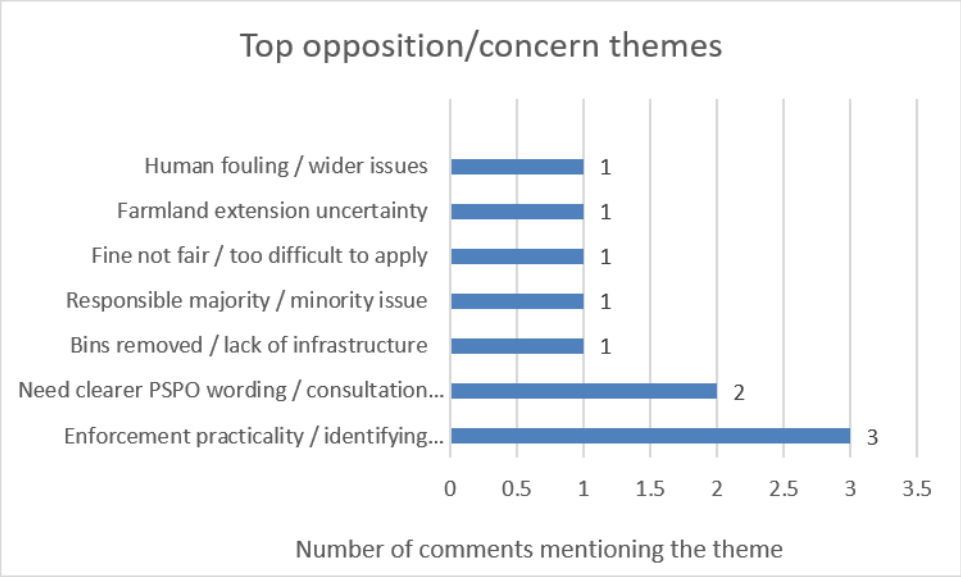
Themes supporting restrictions

Theme	Comments mentioning theme*
Public health / hygiene / unpleasantness	26
Enforcement / deterrent / policing	13
Children / families / play and picnic areas	12
Pavements / roads / doorsteps / streets	12
Responsible ownership / irresponsible dog owners	11
Higher fine / stronger penalty	11
Parks / seafront / gardens / public spaces	11
Dog urine / wider dog nuisance	9



Themes opposing or raising concerns about restrictions

Theme	**Comments mentioning theme***
Enforcement practicality / identifying offenders	3
Need clearer PSPO wording / consultation detail	2
Bins removed / lack of infrastructure	1
Responsible majority / minority issue	1
Fine not fair / too difficult to apply	1
Farmland extension uncertainty	1
Human fouling / wider issues	1



Summary of qualitative feedback

Supportive comments focused strongly on public health, hygiene and the negative impact of dog fouling on shared spaces. Respondents described dog mess as unpleasant, unsafe and damaging to the enjoyment and reputation of parks, pavements, gardens and the seafront.

Children and families were a recurring concern. Many respondents highlighted the risk of children playing in contaminated areas, people stepping in dog mess, and dog fouling being brought into homes, picnic areas and other public spaces.

Many supportive comments identified irresponsible dog owners as the main issue and called for stronger enforcement. Respondents frequently stated that restrictions and fixed penalties are only effective when they are visible, consistently enforced and supported by regular monitoring.

Comments raising concerns generally did not oppose measures to tackle dog fouling in principle. Instead, they focused on practical implementation issues, including difficulties identifying offenders, perceptions of limited enforcement capacity, the removal of dog waste bins, the need for clear and unambiguous PSPO wording, and uncertainty about how the proposed farmland extension would operate in practice.

Respondent profile

Respondent type	Count	Percent
Resident of Brighton & Hove	32	97.0%
A local stakeholder	1	3.0%

Ward profile

Ward	Count	Percent of all responses
Preston Park	6	18.2%
Central Hove	3	9.1%
Brunswick & Adelaide	3	9.1%
Patcham & Hollingbury	1	3.0%
Woodingdean	1	3.0%
Whitehawk & Marina	1	3.0%
Wish	1	3.0%
Queen's Park	1	3.0%
Kemptown	1	3.0%
Rottingdean & West Saltdean	1	3.0%
North Portslade	1	3.0%
Hanover & Elm Grove	1	3.0%
Goldsmid	1	3.0%
Regency	1	3.0%
Round Hill	1	3.0%

Conclusion and Recommendation

Overall, the responses indicate strong support for continued action to address dog fouling across the area, with respondents highlighting the benefits for public health, cleanliness, safety and enjoyment of public spaces. While some concerns were raised regarding implementation, these largely related to enforcement, communication and operational delivery rather than opposition to the aims of the Order itself. The consultation findings therefore provide a clear rationale for both renewing the existing PSPO and extending its scope, including to the proposed farmland areas, subject to clear wording and effective enforcement arrangements.

It is recommended that the Council proceeds with the renewal and extension of the PSPO to help maintain high standards of environmental quality, protect public health, and respond to the concerns expressed by residents and visitors.

Dog Exclusion: Consultation Response

Total responses analysed: 1,442

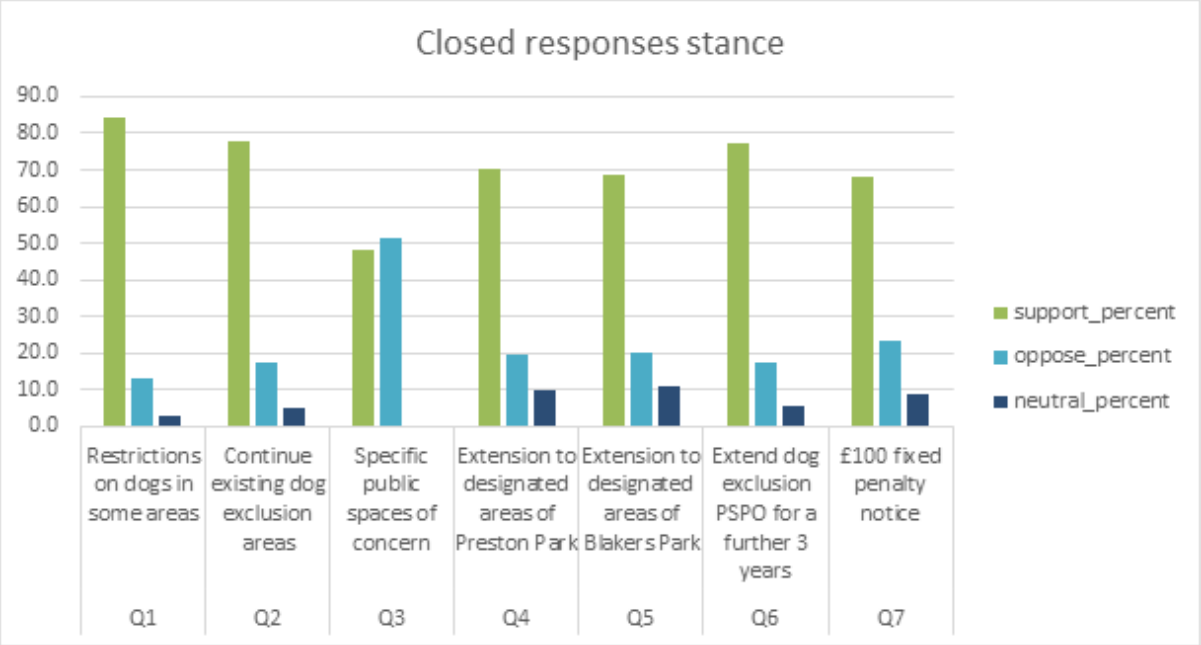
Summary

- 1,442 consultation responses have been analysed from the latest dog exclusion PSPO consultation export.
- Closed responses continue to show strong support for dog restrictions in some areas: 1,213 respondents (84.1%) agreed or strongly agreed that some areas need restrictions on dogs so they can be safe and enjoyable for everyone.
- 1,122 respondents (77.8%) agreed or strongly agreed that the council should continue to exclude dogs from existing areas.
- Support remains high for extending the PSPO to designated areas of Preston Park (1,015, 70.4%) and Blakers Park (992, 68.8%).
- 1,117 respondents (77.5%) agreed with extending the dog exclusion PSPO for a further 3 years, and 979 (67.9%) agreed that a £100 fixed penalty notice is fair.
-

Closed response results

Question	Valid responses	Support / agree	Support %	Oppose / disagree	Oppose %	Neutral / unsure
Q1: Restrictions on dogs in some areas	1,442	1,213	84.1%	186	12.9%	43 (3.0%)
Q2: Continue existing dog exclusion areas	1,442	1,122	77.8%	247	17.1%	73 (5.1%)
Q3: Specific public spaces of concern	1,442	698	48.4%	744	51.6%	0 (0.0%)
Q4: Extension to designated areas of Preston Park	1,442	1,015	70.4%	284	19.7%	143 (9.9%)
Q5: Extension to designated	1,442	992	68.8%	292	20.2%	158 (11.0%)

areas of Blakers Park						
Q6: Extend dog exclusion PSPO for a further 3 years	1,442	1,117	77.5%	248	17.2%	77 (5.3%)
Q7: £100 fixed penalty notice	1,442	979	67.9%	339	23.5%	124 (8.6%)

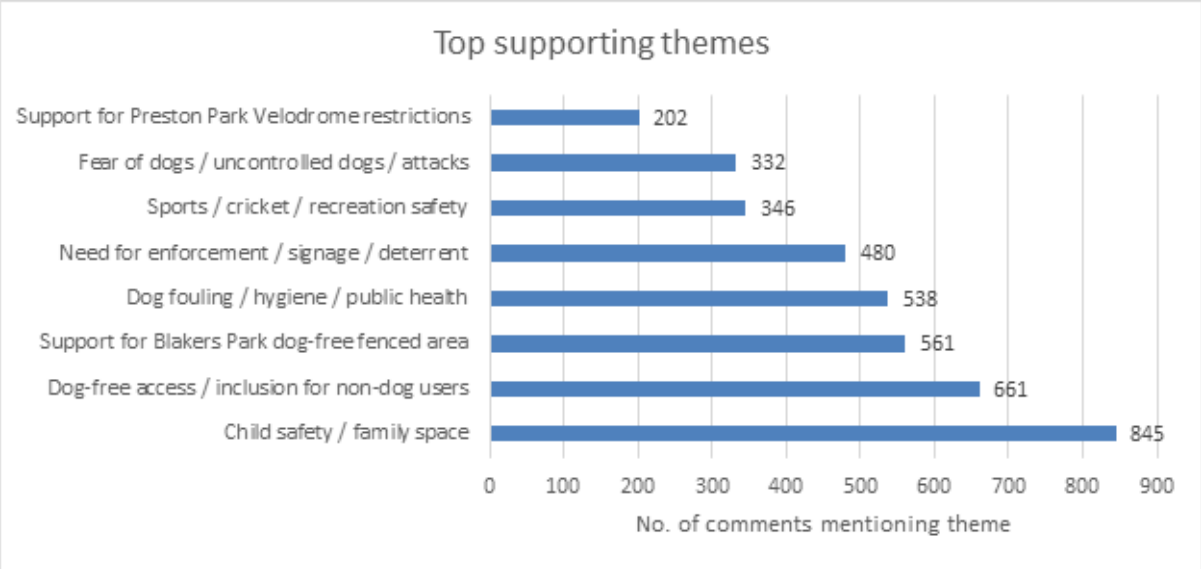


Main qualitative themes

Themes in favour of dog excluded areas

Theme	Comments mentioning theme*
Child safety / family space	845
Dog-free access / inclusion for non-dog users	661
Support for Blakers Park dog-free fenced area	561
Dog fouling / hygiene / public health	538

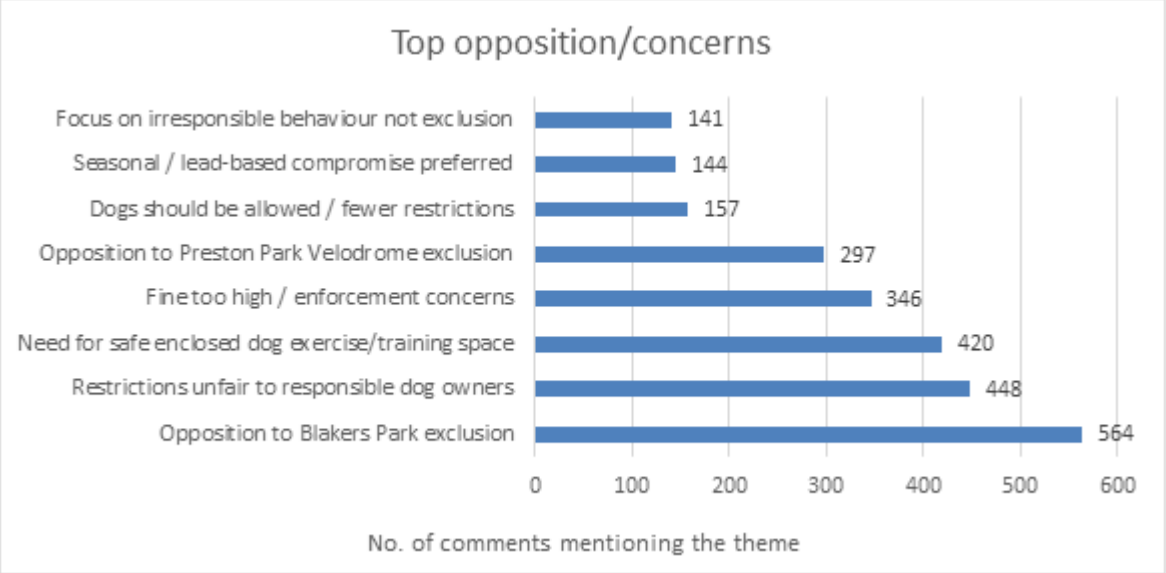
Need for enforcement / signage / deterrent	480
Sports / cricket / recreation safety	346
Fear of dogs / uncontrolled dogs / attacks	332
Support for Preston Park Velodrome restrictions	202



Themes opposing or raising concerns about dog excluded areas

Theme	**Comments mentioning theme***
Opposition to Blakers Park exclusion	564
Restrictions unfair to responsible dog owners	448
Need for safe enclosed dog exercise/training space	420
Fine too high / enforcement concerns	346
Opposition to Preston Park Velodrome exclusion	297
Dogs should be allowed / fewer restrictions	157

Seasonal / lead-based compromise preferred	144
Focus on irresponsible behaviour not exclusion	141



Summary of qualitative feedback

Among respondents supporting the PSPO, the dominant themes remain child and family safety, hygiene and public health, and the need for people who are frightened of dogs, have allergies or want predictable dog-free spaces to access clean and calm areas. Comments frequently refer to dog fouling, residual mess and dog urine as barriers to children playing, crawling or picnicking safely on grassed areas.

Blakers Park remains the strongest location-specific issue. Supporters describe the fenced area as a historically dog-free family space used for picnics, small children, parties and play. Opposing or concern-raising respondents describe the same fenced area as one of the few safe enclosed places where dogs, especially puppies and dogs in training, can be exercised away from nearby roads.

Preston Park Velodrome remains the other prominent location-specific issue. Supporters refer to conflict between dogs and cyclists, cricket use, sports safety and dog fouling on the pitch or track area. Some opposing respondents suggest compromises, such as seasonal access, dogs on leads, or use when the area is not being used for sport.

For the £100 fixed penalty notice, respondents who support the penalty generally see it as a necessary deterrent. However, comments continue to emphasise that enforcement, clearer signage and easier reporting are critical to making the rules meaningful and fair. Some respondents who disagree with the level of the fine either feel it is too high or, more commonly in the comments, not high enough to deter repeat breaches.

Respondent profile

Respondent type	Count	Percent
Resident of Brighton & Hove	1,376	95.4%
A local stakeholder	23	1.6%
A visitor	20	1.4%
A local community or voluntary group	10	0.7%
Other	10	0.7%
A local business	3	0.2%

Ward profile

Ward	Count	Percent of all responses
Hollingdean & Fiveways	484	33.6%
Preston Park	326	22.6%
Hanover & Elm Grove	63	4.4%
Patcham & Hollingbury	46	3.2%
Central Hove	43	3.0%
Brunswick & Adelaide	37	2.6%
Round Hill	36	2.5%
Kemptown	35	2.4%
Wish	24	1.7%
Queen's Park	20	1.4%
Regency	19	1.3%
Goldsmid	19	1.3%

Conclusion and Recommendation

The consultation demonstrates strong and consistent public support for the continuation and extension of existing dog exclusion controls. A significant majority

of respondents agreed that areas require restrictions on dogs, supported the continuation of existing dog exclusion areas and support a PSPO extension for a further three years. Support was also evident for extending the PSPO to additional designated areas, with 70.4% of respondents supporting the proposals for Preston Park and 68.8% supporting the proposals for Blakers Park.

Having reviewed the consultation findings, Council considers that the results provide a robust evidence base demonstrating public support for the proposed measures. The Council is satisfied that the continuation and extension of the Dog Exclusion PSPO is both necessary and proportionate to help balance the needs of dog owners with those of other park users, whilst protecting the quality, safety and accessibility of parks and open spaces.

Blakers Park

The consultation evidence shows particularly strong support for retaining a dog-free area within Blakers Park. Of the comments referring specifically to the Blakers Park fenced area, 293 supported exclusion or restrictions, while only 17 raised concerns about exclusion. While it is acknowledged that some residents use the fenced area for exercising and training dogs, public parks must cater for a wide range of users. Families with young children deserve access to a clean and dog-free space where they can relax, play and socialise with confidence. The evidence suggests that the majority of respondents believe the fenced area should continue to fulfil this purpose.

Preston Park Velodrome

The Velodrome and associated recreational facilities are dedicated spaces for organised sport and physical activity. Consultation respondents frequently referred to conflicts between dogs and users of these facilities, particularly cyclists, cricketers and other sports participants.

Support for restrictions around the Velodrome was clear. Among comments specifically mentioning the location, 45 supported restrictions while only 5 expressed concerns about exclusion. More broadly, over 70% of respondents supported the proposed Preston Park exclusion area.

Designating this area as dog-free would help ensure that sports facilities remain safe, clean and fit for purpose while reducing potential conflicts between different park users.

Importantly, the proposals do not prevent dog owners from using either park. They simply establish specific locations where dog-free access is prioritised, while the majority of park space remains available for responsible dog walking.

Dogs On Leads By Direction: Consultation Response

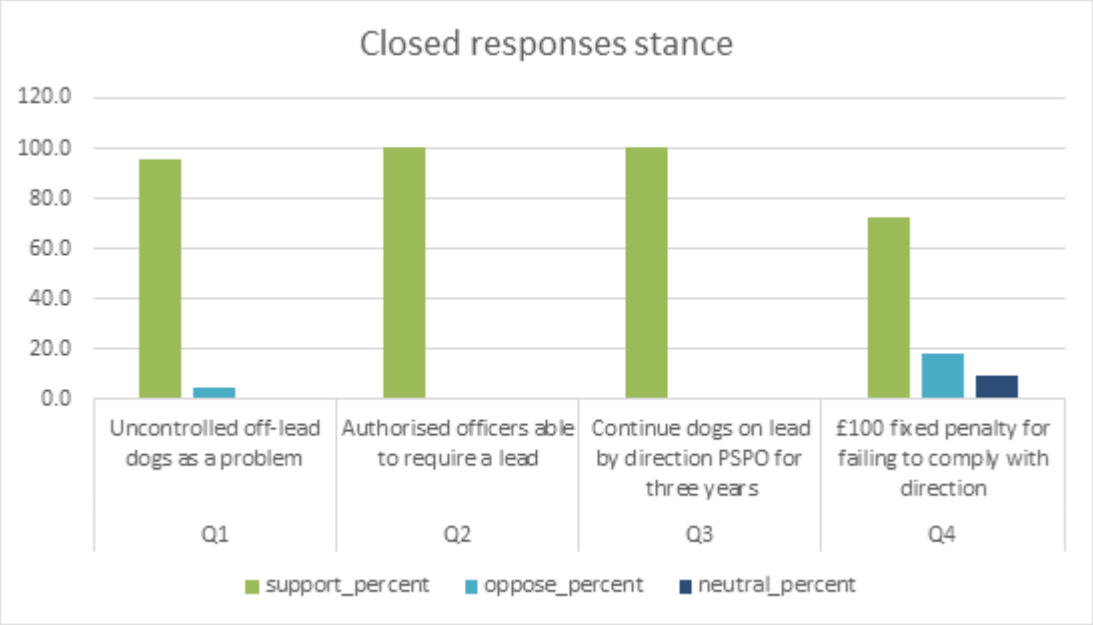
Total responses analysed: 22

Summary

- 22 consultation responses have been received.
- 21 respondents (95.5%) agreed or strongly agreed that some owners do not keep proper control when dogs are off lead, which can cause problems, while 1 (4.5%) disagreed or strongly disagreed.
- 22 respondents (100.0%) agreed or strongly agreed that authorised officers should be able to ask for a dog to be put on a lead if it is causing, or may cause, problems or concern for others.
- 22 respondents (100.0%) agreed that the PSPO should continue for another three years.
- 16 respondents (72.7%) agreed that a £100 fine is fair for people who do not put their dog on a lead when asked to by an authorised council officer.

Closed response results

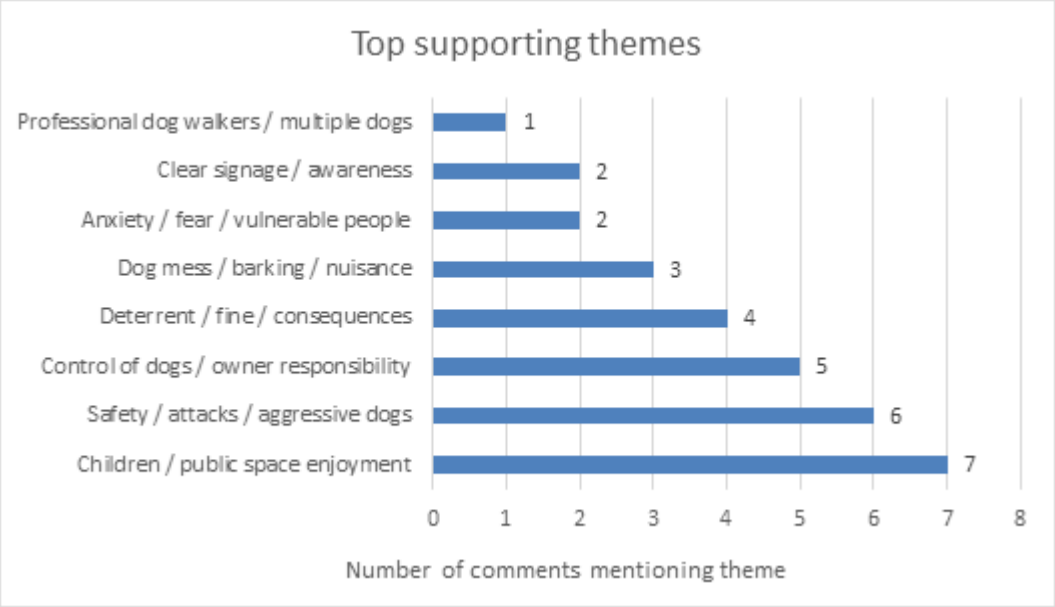
Question	Valid responses	Support / agree	Support %	Oppose / disagree	Oppose %	Neutral / unsure
Q1: Uncontrolled off-lead dogs as a problem	22	21	95.5%	1	4.5%	0 (0.0%)
Q2: Authorised officers able to require a lead	22	22	100.0%	0	0.0%	0 (0.0%)
Q3: Continue dogs on lead by direction PSPO for three years	22	22	100.0%	0	0.0%	0 (0.0%)
Q4: £100 fixed penalty for failing to comply with direction	22	16	72.7%	4	18.2%	2 (9.1%)



Main qualitative themes

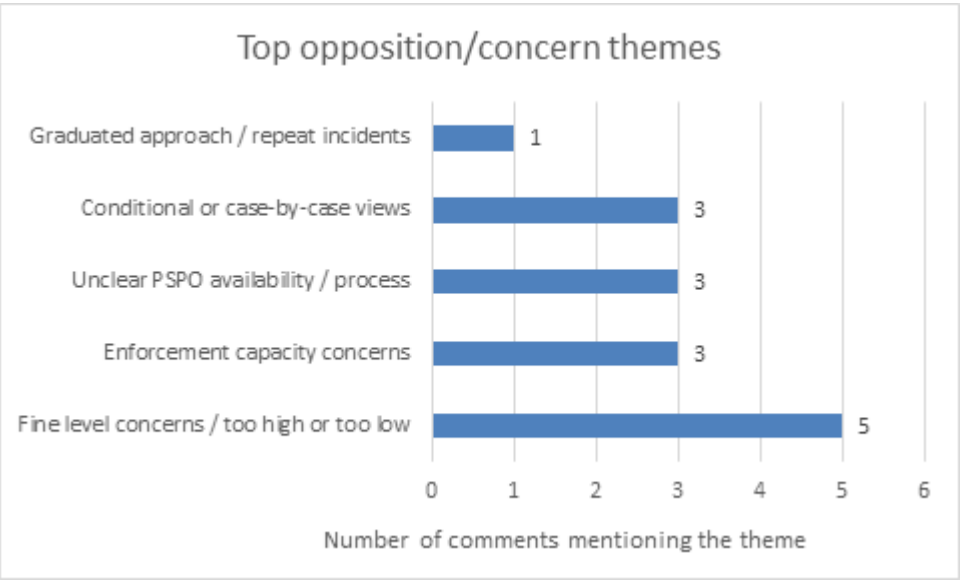
Themes supporting dogs on lead by direction

Theme	**Comments mentioning theme***
Children / public space enjoyment	7
Safety / attacks / aggressive dogs	6
Control of dogs / owner responsibility	5
Deterrent / fine / consequences	4
Dog mess / barking / nuisance	3
Anxiety / fear / vulnerable people	2
Clear signage / awareness	2
Professional dog walkers / multiple dogs	1



Themes opposing or raising concerns about dogs on lead by direction

Theme	Comments mentioning theme*
Fine level concerns / too high or too low	5
Enforcement capacity concerns	3
Unclear PSPO availability / process	3
Conditional or case-by-case views	3
Graduated approach / repeat incidents	1



Summary of qualitative feedback

Supportive comments primarily focused on concerns about owner responsibility, the control of dogs in public spaces, and the impact that uncontrolled dogs can have on other users of parks and green spaces. Respondents frequently described situations where dogs ran towards people, jumped up at them, or failed to respond to their owners' commands, creating experiences that were perceived as intimidating, unsafe, or disruptive.

Feelings of anxiety and vulnerability emerged as strong themes throughout the responses. Many respondents highlighted the experiences of individuals who are nervous around dogs, including children, people with autism, and others who may feel less confident in shared public spaces. There was a recurring view that all users should be able to enjoy parks and natural environments without fear of interactions with uncontrolled dogs.

Many respondents expressed support for the principle of allowing an authorised officer to direct that a dog be placed on a lead when necessary. However, questions were raised about the practical implementation of the measure, including whether there are sufficient authorised officers, how visible the PSPO requirements are to the public, and the extent to which the rules would be actively enforced in parks and green spaces.

Views on the proposed £100 fixed penalty notice were more mixed than views on the PSPO itself. While some respondents considered the amount appropriate, many felt it was too low to act as an effective deterrent. A smaller number of respondents advocated a more graduated enforcement approach, suggesting that first-time incidents should receive a warning, with financial penalties reserved for repeated or more serious instances of non-compliance.

Respondent profile

Respondent type	**Count**	**Percent**
Resident of Brighton & Hove	21	95.5%
A local stakeholder	1	4.5%

Ward profile

Ward	**Count**	**Percent of all responses**
Preston Park	6	27.3%
Brunswick & Adelaide	3	13.6%
Hollingdean & Fiveways	3	13.6%
Westdene & Hove Park	2	9.1%

Wish	1	4.5%
Kemptown	1	4.5%
Regency	1	4.5%

Conclusion and Recommendations

Overall, the consultation responses indicate strong support for measures aimed at addressing the issue of dogs that are not kept under proper control in public spaces. Respondents consistently described negative impacts on the use and enjoyment of parks and green spaces, including fear, distress and safety concerns experienced by other users. The evidence provided through the consultation suggests that the behaviour of some dog owners has had a detrimental effect on the quality of life of those using affected areas and that these impacts are likely to be ongoing in the absence of intervention.

On this basis, the proposed PSPO appears to meet the statutory test, in that it is intended to address activities that have had, or are likely to have, a detrimental effect on the local community's quality of life, are persistent or continuing in nature, and are considered unreasonable. The proposed requirement for dogs to be placed on a lead when directed by an authorised officer is viewed by many respondents as a proportionate and targeted measure to balance responsible dog ownership with the rights of all users to enjoy public spaces safely.

Dogs On Leads: Consultation Response

Total responses analysed: 46

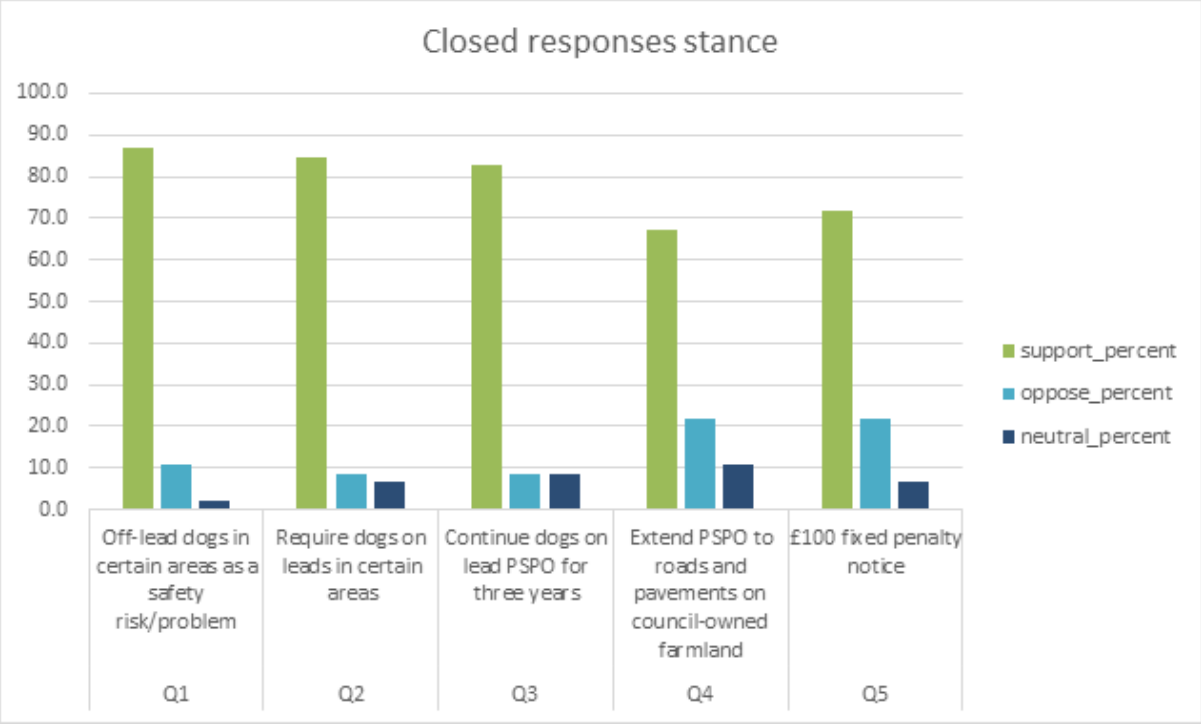
Summary

- 46 consultation responses have been received.
- 40 respondents (87.0%) agreed or strongly agreed that dogs being off the lead in certain areas can be a safety risk or cause problems, while 5 (10.9%) disagreed or strongly disagreed.
- 39 respondents (84.8%) agreed or strongly agreed that people should be required to keep their dogs on a lead in certain areas, while 4 (8.7%) disagreed or strongly disagreed.
- 38 respondents (82.6%) agreed that the dogs on lead PSPO should continue for another 3 years, while 4 (8.7%) disagreed.
- 31 respondents (67.4%) agreed that the PSPO should extend to roads and pavements on council-owned farmland, and 33 (71.7%) agreed that a £100 fine is fair.

Closed response results

Question	Valid responses	Support / agree	Support %	Oppose / disagree	Oppose %	Neutral / unsure
Q1: Off-lead dogs in certain areas as a safety risk/problem	46	40	87.0%	5	10.9%	1 (2.2%)
Q2: Require dogs on leads in certain areas	46	39	84.8%	4	8.7%	3 (6.5%)
Q3: Continue dogs on lead PSPO for three years	46	38	82.6%	4	8.7%	4 (8.7%)
Q4: Extend PSPO to roads and pavements on council-owned farmland	46	31	67.4%	10	21.7%	5 (10.9%)

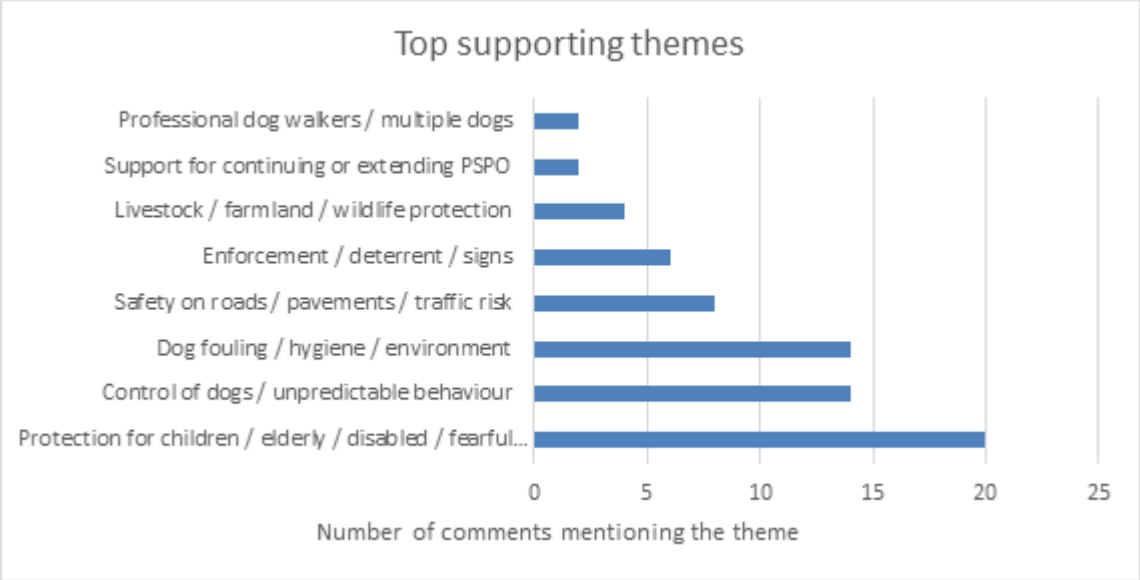
Q5: £100 fixed penalty notice	46	33	71.7%	10	21.7%	3 (6.5%)



Main qualitative themes

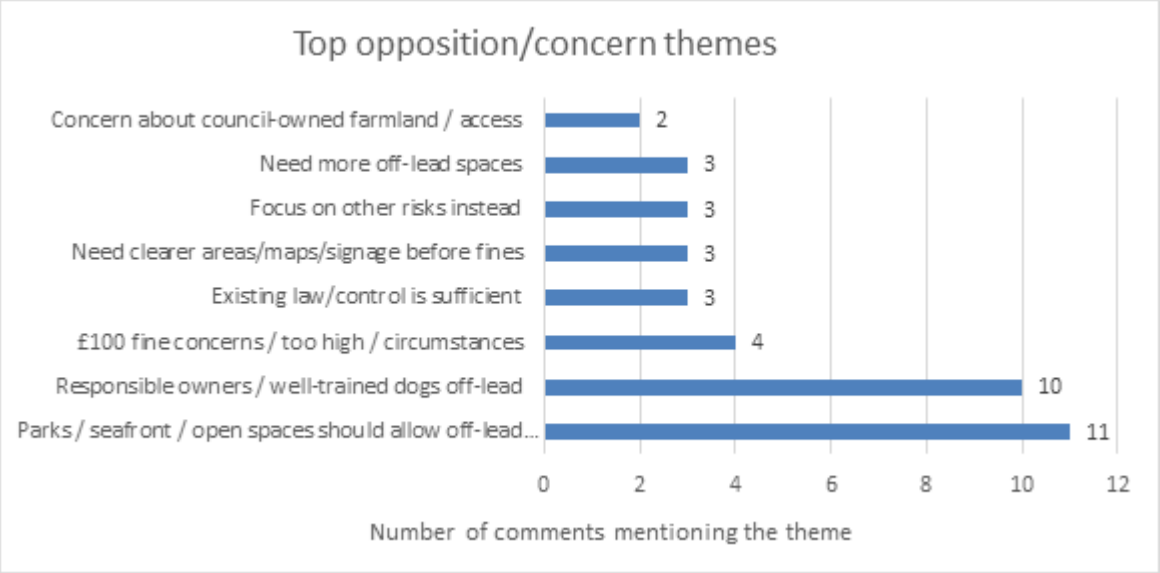
Themes supporting dogs on lead requirements

Theme	Comments mentioning theme*
Protection for children / elderly / disabled / fearful users	20
Control of dogs / unpredictable behaviour	14
Dog fouling / hygiene / environment	14
Safety on roads / pavements / traffic risk	8
Enforcement / deterrent / signs	6
Livestock / farmland / wildlife protection	4
Support for continuing or extending PSPO	2
Professional dog walkers / multiple dogs	2



Themes opposing or raising concerns

Theme	**Comments mentioning theme***
Parks / seafront / open spaces should allow off-lead dogs	11
Responsible owners / well-trained dogs off-lead	10
£100 fine concerns / too high / circumstances	4
Existing law/control is sufficient	3
Need clearer areas/maps/signage before fines	3
Focus on other risks instead	3
Need more off-lead spaces	3
Concern about council-owned farmland / access	2



Summary of qualitative feedback

Supportive comments most commonly focus on issues of safety and control. Respondents highlight concerns about dogs running into roads, approaching children or people who are uncomfortable around dogs, jumping up at members of the public, fouling out of sight of their owners, or behaving unpredictably even when owners consider them to be well trained. Many respondents therefore view lead requirements as an important measure for reducing risk in shared public spaces.

A second recurring theme is that lead requirements can protect dogs as well as the wider public. Respondents note that dogs may become startled, distracted, injured, or involved in incidents with vehicles, cyclists, e/scooters, wildlife, or other animals. As a result, supporters generally regard lead requirements as a proportionate way of ensuring dogs remain under effective control in higher-risk environments.

Support for extending lead requirements to council-owned farmland is largely linked to concerns about livestock, wildlife and animal welfare. Respondents frequently refer to the risk of dogs chasing or disturbing livestock and wildlife. However, some respondents emphasise the need for clearer mapping, definitions and signage before restrictions or enforcement measures are introduced, particularly in relation to farmland, footpaths, bridleways and areas such as Stanmer Park.

Comments expressing opposition or reservations tend to focus on responsible dog ownership and the behaviour of well-trained dogs. These respondents often argue against blanket restrictions in parks, open spaces and along the seafront, preferring an approach based on dogs being under effective control or enforcement being targeted where specific problems occur. vSome also suggest that cyclists, e-scooters and other fast-moving users can present a greater safety risk than dogs in certain locations.

Respondent profile

Respondent type	Count	Percent
Resident of Brighton & Hove	45	97.8%
A local stakeholder	1	2.2%

Ward profile

Ward	Count	Percent of all responses
Hollingdean & Fiveways	8	17.4%
Preston Park	7	15.2%
Brunswick & Adelaide	4	8.7%
Central Hove	3	6.5%
Regency	3	6.5%
Wish	2	4.3%
Hanover & Elm Grove	2	4.3%
Kemptown	2	4.3%
Moulsecoomb & Bevendean	1	2.2%
Woodingdean	1	2.2%
Westdene & Hove Park	1	2.2%
Queen's Park	1	2.2%

Conclusion and Recommendations

The consultation demonstrates strong public support for the continuation of the dogs on lead PSPO. Support levels exceeded 80% across key proposals the lowest being 67.4%, indicating broad agreement that these activities present a problem and should be restricted in public spaces.

Based on the consultation responses received, there is strong support for continuing and strengthening the proposed restrictions.

Prohibition Of Professional Dog Walking In Blakers Park: Consultation Response

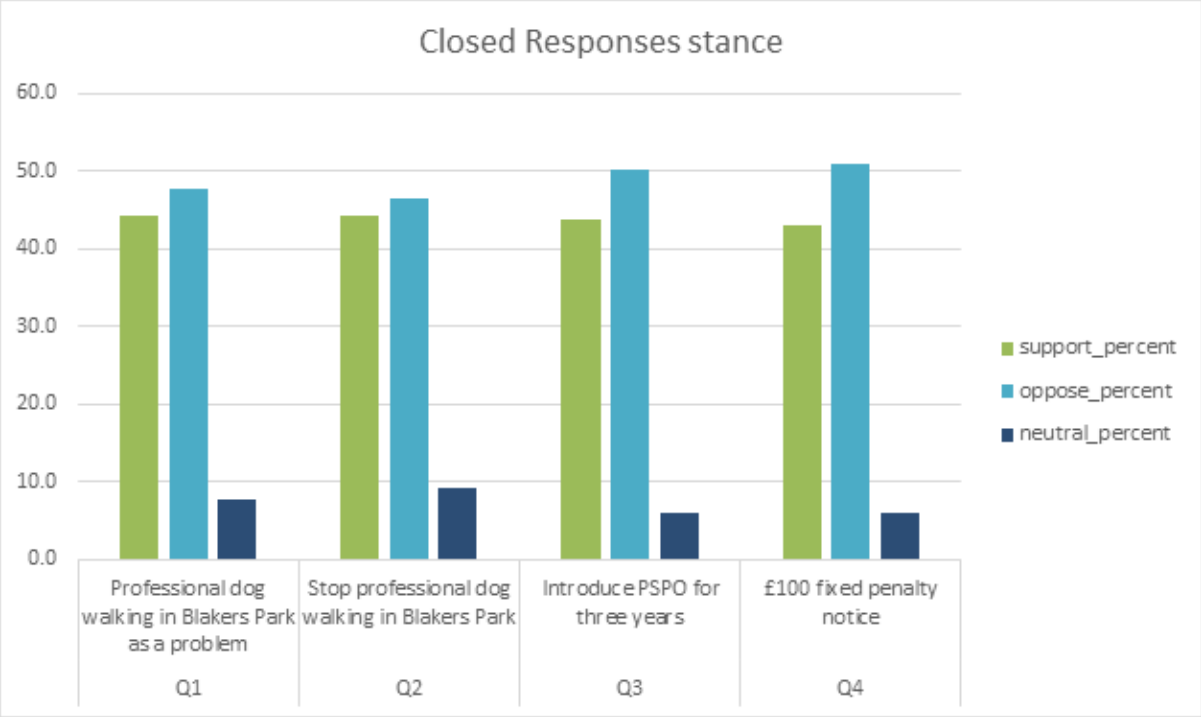
Total responses analysed: 153

Summary

- 153 consultation responses have been received
- 68 respondents (44.4%) agreed or strongly agreed that professional dog walking in Blakers Park is a problem, while 73 (47.7%) disagreed or strongly disagreed.
- 68 respondents (44.4%) agreed or strongly agreed that the council should stop professional dog walking in Blakers Park, while 71 (46.4%) disagreed or strongly disagreed.
- 67 respondents (43.8%) agreed that a new PSPO should be put in place for the next 3 years, while 77 (50.3%) disagreed.
- 66 respondents (43.1%) agreed that a £100 fine is fair, while 78 (51.0%) disagreed.

Closed response results

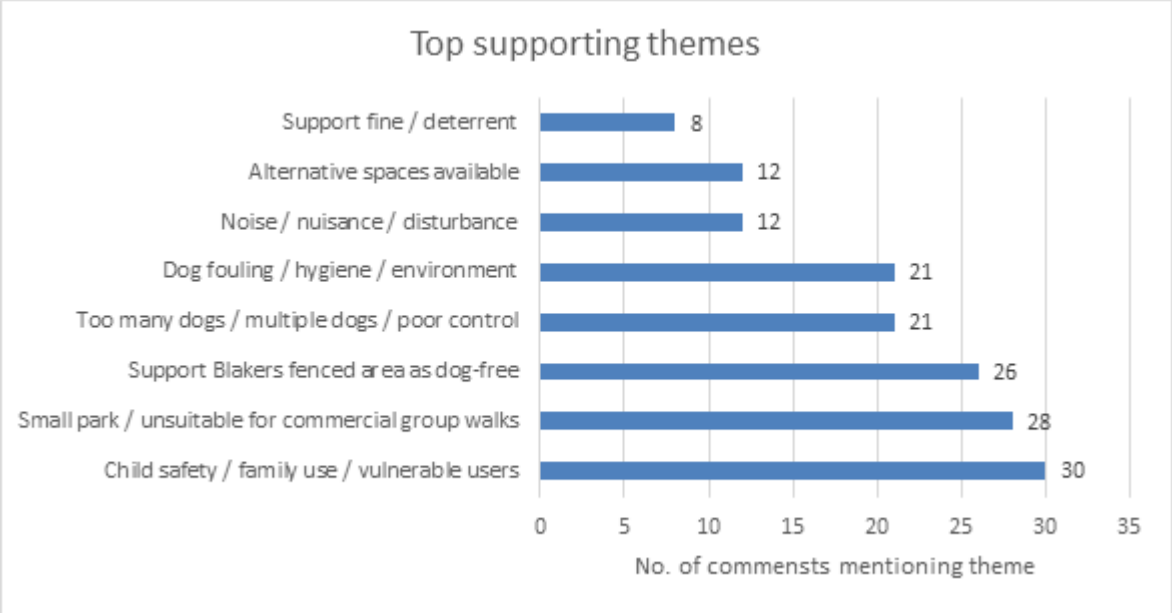
Question	Valid responses	Support / agree	Support %	Oppose / disagree	Oppose %	Neutral / unsure
Q1: Professional dog walking in Blakers Park as a problem	153	68	44.4%	73	47.7%	12 (7.8%)
Q2: Stop professional dog walking in Blakers Park	153	68	44.4%	71	46.4%	14 (9.2%)
Q3: Introduce PSPO for three years	153	67	43.8%	77	50.3%	9 (5.9%)
Q4: £100 fixed penalty notice	153	66	43.1%	78	51.0%	9 (5.9%)



Main qualitative themes

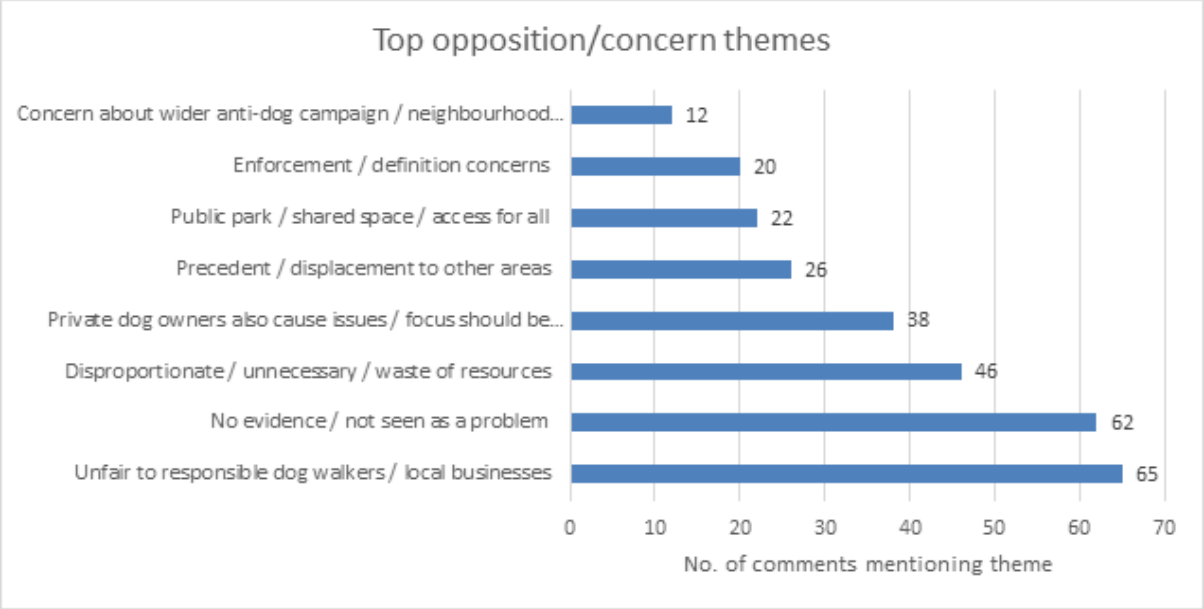
Themes supporting restrictions

Theme	Comments mentioning theme*
Child safety / family use / vulnerable users	30
Small park / unsuitable for commercial group walks	28
Support Blakers fenced area as dog-free	26
Too many dogs / multiple dogs / poor control	21
Dog fouling / hygiene / environment	21
Noise / nuisance / disturbance	12
Alternative spaces available	12
Support fine / deterrent	8



Themes opposing or raising concerns about restrictions

Theme	**Comments mentioning theme***
Unfair to responsible dog walkers / local businesses	65
No evidence / not seen as a problem	62
Disproportionate / unnecessary / waste of resources	46
Private dog owners also cause issues / focus should be behaviour	38
Precedent / displacement to other areas	26
Public park / shared space / access for all	22
Enforcement / definition concerns	20
Concern about wider anti-dog campaign / neighbourhood conflict	12



Summary of qualitative feedback

Supportive comments continue to characterise Blakers Park as a small, well-used neighbourhood park that is unsuitable for commercial group dog walking. Recurring concerns include the presence of multiple dogs, off-lead dogs, long leads, barking, dog fouling, and conflicts with children, families, picnickers and other vulnerable park users.

The fenced area remains a significant related issue. Many respondents supporting the proposal call for the area to be retained or restored as a dog-free space, describing it as a historically valued area for children's play, family gatherings, picnics and use by people who are uncomfortable or anxious around dogs.

Comments opposing the proposal continue to focus on questions of evidence, proportionality and potential displacement effects. Many respondents state that they have not observed professional dog walkers operating in Blakers Park, question whether a sufficient case for intervention has been established and argue that restrictions could displace activity to other parks, affect local businesses, or create access and animal welfare concerns.

A number of respondents suggest alternative approaches to a blanket prohibition. These include introducing limits on the number of dogs that may be walked at one time, establishing an accreditation scheme for professional dog walkers, promoting voluntary codes of conduct, working more closely with local businesses, and targeting enforcement at irresponsible behaviour regardless of whether the individual is a professional or private dog walker.

Respondent profile

Respondent type	Count	Percent

Resident of Brighton & Hove	142	92.8%
A local stakeholder	4	2.6%
A local business	3	2.0%
A local community or voluntary group	2	1.3%
Other	2	1.3%

Ward profile

Ward	Count	Percent of all responses
Hollingdean & Fiveways	60	39.2%
Preston Park	43	28.1%
Patcham & Hollingbury	6	3.9%
Round Hill	3	2.0%
Kemptown	2	1.3%
North Portslade	2	1.3%
South Portslade	2	1.3%
Regency	1	0.7%

Conclusion and Recommendation

The consultation demonstrates that there is no clear mandate for the proposed measures. More respondents opposed the proposals than supported them across every question asked. These results indicate that respondents do not view professional dog walking as a significant issue to justify new restrictions, a Public Spaces Protection Order, or financial penalties.

While concerns have been raised regarding child safety, dog numbers, fouling, noise and responsible control, these issues relate to the behaviour of individual dog owners and walkers rather than the professional status of the person walking the dogs. Existing legislation and park bylaws already provide mechanisms to address irresponsible behaviour, dog fouling and dogs that are out of control.

The majority of responders do not support the implementation and extension of the PSPO Exclusion of Professional Dog Walkers in Blakers Park. The consultation findings do not demonstrate a strong community consensus. This PSPO is not recommended to be progressed at this time.

Drone Use Restriction in Brighton & Hove: Consultation Response

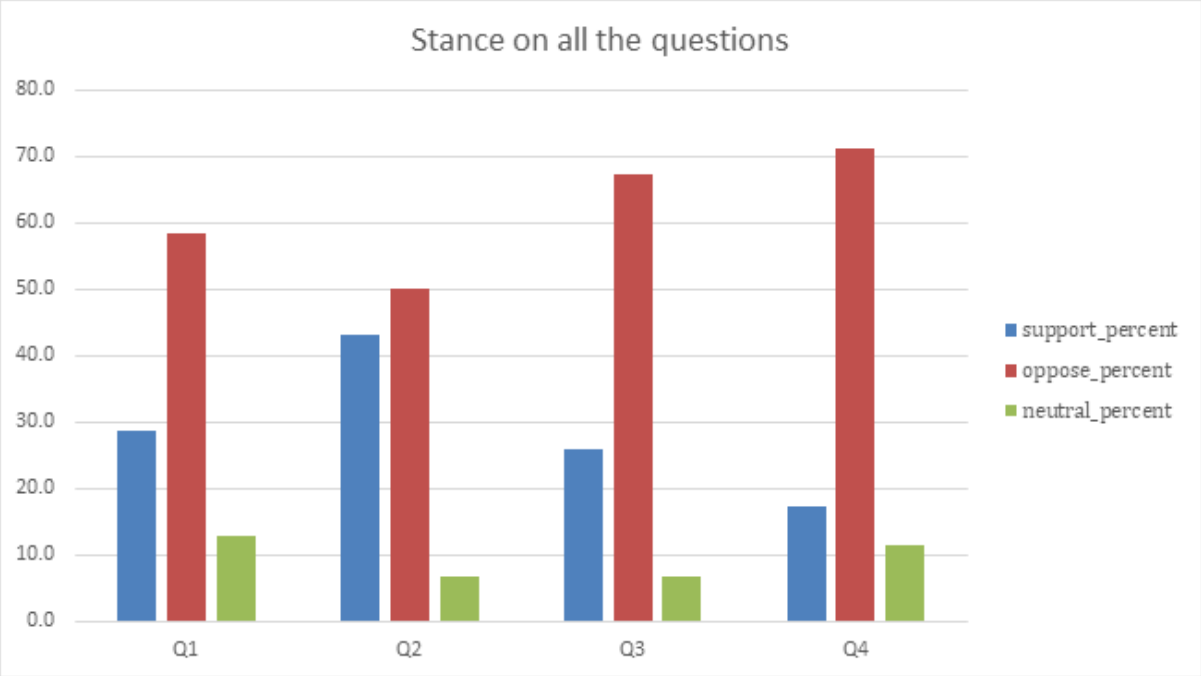
Total responses analysed: 132

Summary

- 132 consultation responses received.
- 38 respondents (28.8%) agreed or strongly agreed that flying drones outside CAA guidelines in public spaces is a problem and potential hazard.
- 57 respondents (43.2%) agreed or strongly agreed that the council should stop people flying drones in public spaces if they are not following CAA rules.
- However, support falls for introducing a PSPO for the next three years: 34 respondents (25.8%) agreed, while 89 (67.4%) disagreed.
- Views on the £100 fine are also more negative than positive: 23 (17.4%) agreed it is fair, while 94 (71.2%) disagreed.

Closed response results

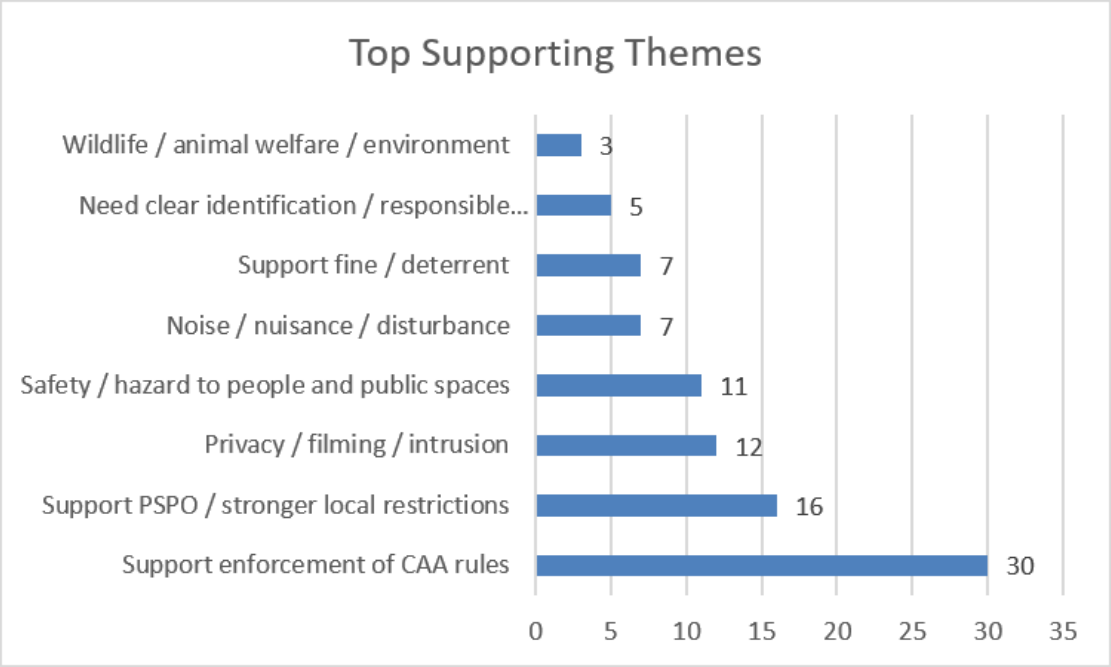
Question	Valid responses	Support / agree	Support %	Oppose / disagree	Oppose %	Neutral / unsure
Q1: Drone flying outside CAA guidelines as a problem / hazard	132	38	28.8%	77	58.3%	17 (12.9%)
Q2: Stopping drone flying where CAA rules are not followed	132	57	43.2%	66	50.0%	9 (6.8%)
Q3: Introduce drone PSPO for three years	132	34	25.8%	89	67.4%	9 (6.8%)
Q4: £100 fixed penalty notice	132	23	17.4%	94	71.2%	15 (11.4%)



Main qualitative themes

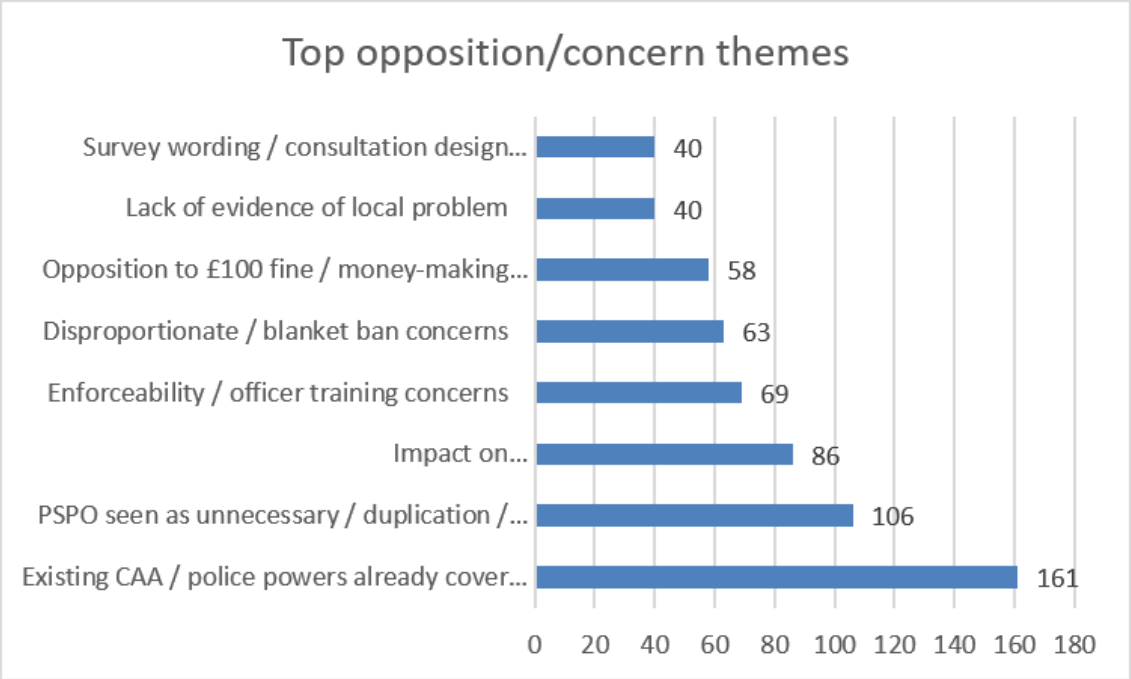
Themes supporting enforcement / restrictions

Theme	Comments mentioning theme*
Support enforcement of CAA rules	30
Support PSPO / stronger local restrictions	16
Privacy / filming / intrusion	12
Safety / hazard to people and public spaces	11
Noise / nuisance / disturbance	7
Support fine / deterrent	7
Need clear identification / responsible checks	5
Wildlife / animal welfare / environment	3



Themes opposing or raising concerns about the PSPO

Theme	Comments mentioning theme*
Existing CAA / police powers already cover this	161
PSPO seen as unnecessary / duplication / overreach	106
Impact on responsible/commercial/recreational drone users	86
Enforceability / officer training concerns	69
Disproportionate / blanket ban concerns	63
Opposition to £100 fine / money-making concern	58
Lack of evidence of local problem	40
Survey wording / consultation design concerns	40



Summary

Supportive comments predominantly focus on concerns relating to privacy, safety and nuisance. Respondents in favour of action describe drones as potentially intrusive, noisy, unsafe and disruptive in public spaces. Some also raise concerns about potential impacts on wildlife and animal welfare. A smaller number support stronger measures, such as a blanket ban or increased fixed penalties, on the grounds that drone misuse represents an invasion of privacy and requires a stronger deterrent.

A consistent theme across both supportive and opposing responses is the distinction between compliant and non-compliant drone use. Many respondents support action against individuals operating drones outside Civil Aviation Authority (CAA) rules but do not necessarily support the introduction of a broad Public Spaces Protection Order (PSPO). This distinction is reflected in the consultation results, where support for addressing non-compliant drone use is notably higher than support for introducing a three-year PSPO.

The main arguments against the proposal relate to the existence of the current national regulatory framework. Many respondents note that drone use is already regulated by the CAA and subject to police enforcement and therefore consider a local PSPO to be a duplication of existing legislation. Others argue that the council has not demonstrated sufficient local evidence to justify additional restrictions. Concerns about proportionality are also common. Respondents frequently describe a blanket or wide-ranging restriction as unfair to responsible and registered drone

users, including hobbyists, commercial operators and visitors who comply with existing regulations.

Practical issues surrounding enforcement are also raised. These include questions about whether council officers would have the technical expertise required to assess compliance with CAA regulations, whether the proposed restrictions apply solely to take-off and landing from council-owned land or extend to flights through local airspace, and whether overflight by drones launched from outside council land would remain lawful. Some respondents also express concern that the consultation wording does not clearly distinguish between unsafe or unlawful drone activity and lawful drone use.

Respondent profile

Respondent type	Count	Percent
Resident of Brighton & Hove	55	41.7%
A visitor	55	41.7%
Other	16	12.1%
A local stakeholder	5	3.8%
A local community or voluntary group	1	0.8%

Further clarification on the PSPO

The council officers have considered the comments from the consultation. Many responses appear to misunderstand the intent and approach to this PSPO. This PSPO proposal related to: **No unauthorised drones to take off or land on the Council owned parks and open spaces.** The Council recognise that the CAA hold the responsibility and rules around drones when in the air.

The proposed PSPO sought to prohibit the unauthorised take-off and landing of drones within council-managed parks and public open spaces. The measure was intended to protect public safety, reduce nuisance and privacy impacts, safeguard children and vulnerable park users, protect wildlife and support compliance with existing CAA regulations. The restriction did not seek to regulate airspace, which remains the responsibility of the Civil Aviation Authority. The PSPO would provide a clear and proportionate local enforcement mechanism where drone activity is causing or is likely to cause a detrimental effect on the quality of life of those using public spaces.

1. Protection of public safety
Parks and open spaces are heavily used by children, families, sports participants and other visitors. Drones can present a risk of injury through collision, loss of control, mechanical failure or operator error, particularly in busy recreational environments. Additional meetings with some drone experts supported the Council's proposed approach.

2. Protection of children's recreation areas
Playgrounds and informal recreation spaces attract vulnerable users who may not be aware of drone operations nearby. Restricting take-off and landing helps reduce risks associated with drones being operated in close proximity to children.

3. Prevention of nuisance and anti-social behaviour
Consultation responses supporting controls commonly referred to drones as intrusive, disruptive or a nuisance, particularly where they are flown repeatedly in busy public spaces. Supportive comments linked drones with concerns around nuisance, noise and disturbance.

4. Protection of privacy
A recurring concern raised by residents is the perceived invasion of privacy caused by drones equipped with cameras operating near people using parks and open spaces or adjacent residential properties. Consultation responses identified privacy and filming concerns as a key reason for supporting restrictions. Additional meetings with female residents also raised privacy concerns.

5. Protection of wildlife and biodiversity
Many parks, nature reserves and open spaces contain sensitive habitats, nesting birds and other wildlife. Drone activity can disturb wildlife, particularly during breeding and nesting seasons. Although wildlife concerns were less frequently raised during consultation, they were identified as part of the supporting evidence base for restrictions.

6. Supporting compliance with CAA regulations
The purpose of the PSPO would not be to replace national aviation legislation but to provide a practical local mechanism to address unauthorised drone activity on council land. Council consultation materials stated that the intention was to address drone use in public spaces where operators are not complying with CAA guidance.

7. Providing an enforceable local control
CAA regulations can be complex, and enforcement generally falls to aviation regulators and the police. A PSPO provides a simple, locally enforceable rule regarding take-off and landing from council-owned land, allowing authorised officers

to intervene where activity is causing nuisance, safety concerns or community impacts. This aligns with the purpose of PSPOs to address activities that are detrimental to the quality of life of those using an area.

8. Consistent management across the city's parks
A citywide approach avoids displacement of activity from one park to another and provides a clear, consistent rule across council-managed parks and open spaces. Similar reasoning has been used in other proposed PSPOs affecting parks and open spaces, where a citywide approach was considered preferable to managing issues on a site-by-site basis.

Conclusion and Recommendations:

Having considered the consultation responses, available evidence, and the statutory tests set out in section 59 of the Anti-social Behaviour, Crime and Policing Act 2014, there is evidence that unauthorised drone take-off and landing from council-owned parks and open spaces has caused concerns relating to public safety, privacy, nuisance, and the enjoyment of public spaces. These concerns have been raised consistently through the consultation and engagement activities, particularly in relation to vulnerable users, children and the perceived intrusion associated with drone activity in recreational environments.

However, the consultation also identified significant concerns regarding the necessity and proportionality of a citywide PSPO. Many respondents distinguished between responsible, lawful drone use and non-compliant activity, expressing support for enforcement against misuse rather than a blanket restriction on all drone operators. Concerns were also raised regarding the sufficiency of local evidence, the practicalities of enforcement, and the potential impact on legitimate hobbyist, commercial and recreational users.

While the Council intended that the proposed PSPO would apply only to the unauthorised take-off and landing of drones from council-owned land and would not seek to regulate airspace, the available evidence does not clearly demonstrate that the identified issues are sufficiently persistent, continuing and widespread across all council-managed parks and open spaces to justify a citywide restriction.

Furthermore, given the existence of alternative legislative and regulatory controls, there remains a question as to whether the proposed restriction represents the most proportionate response to the issues identified.

On balance, it is considered that the statutory tests for introducing a citywide PSPO have not been met to the extent required to justify the making of the Order at this time. Whilst concerns relating to drone activity are acknowledged and supported by

consultation responses, the evidence currently available does not sufficiently demonstrate a persistent and continuing detrimental effect on the quality of life of those in the locality across the full area proposed, nor that a citywide prohibition on unauthorised drone take-off and landing is a necessary and proportionate response.

Recommendation: It is therefore recommended that a Public Spaces Protection Order relating to unauthorised drone take-off and landing on council-owned parks and open spaces is **not progressed at this time**. Instead, the Council should continue to utilise existing powers available through land management, park byelaws where applicable, targeted site restrictions, public education, partnership working with the Civil Aviation Authority and Sussex Police, and the gathering of further evidence should future issues demonstrate a need for additional local controls.

Prohibition Of Unauthorised Overnight Recreational Camping In Public Spaces: Consultation Response

Total responses analysed: 96

Summary

- 96 consultation responses have been received.
- 79 respondents (82.3%) agreed or strongly agreed that recreational camping in public spaces is a problem, while 14 (14.6%) disagreed or strongly disagreed.
- 82 respondents (85.4%) agreed or strongly agreed that the council should stop recreational camping in public spaces, while 12 (12.5%) disagreed or strongly disagreed.
- 81 respondents (84.4%) agreed that a PSPO should be introduced for the next 3 years, while 13 (13.5%) disagreed.
- 54 respondents (56.2%) agreed that a £100 fine is fair, while 26 (27.1%) disagreed.

Closed response results

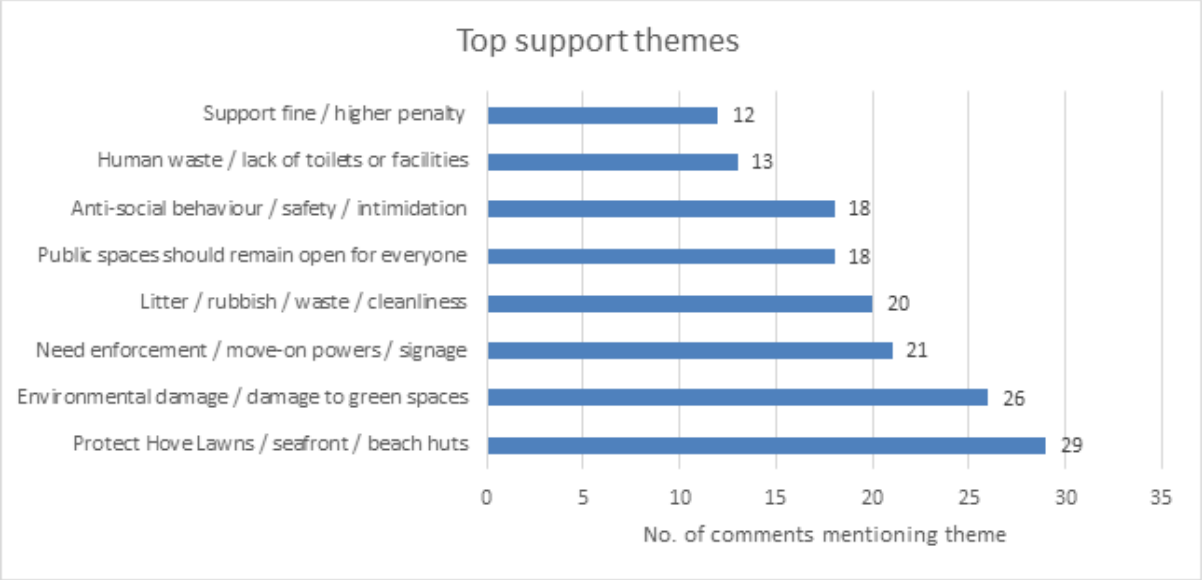
Question	Valid responses	Support / agree	Support %	Oppose / disagree	Oppose %	Neutral / unsure
Q1: Recreational camping in public spaces as a problem	96	79	82.3%	14	14.6%	3 (3.1%)
Q2: Stop recreational camping in public spaces	96	82	85.4%	12	12.5%	2 (2.1%)
Q3: Introduce PSPO for three years	96	81	84.4%	13	13.5%	2 (2.1%)
Q4: £100 fixed penalty notice	96	54	56.2%	26	27.1%	16 (16.7%)



Main qualitative themes

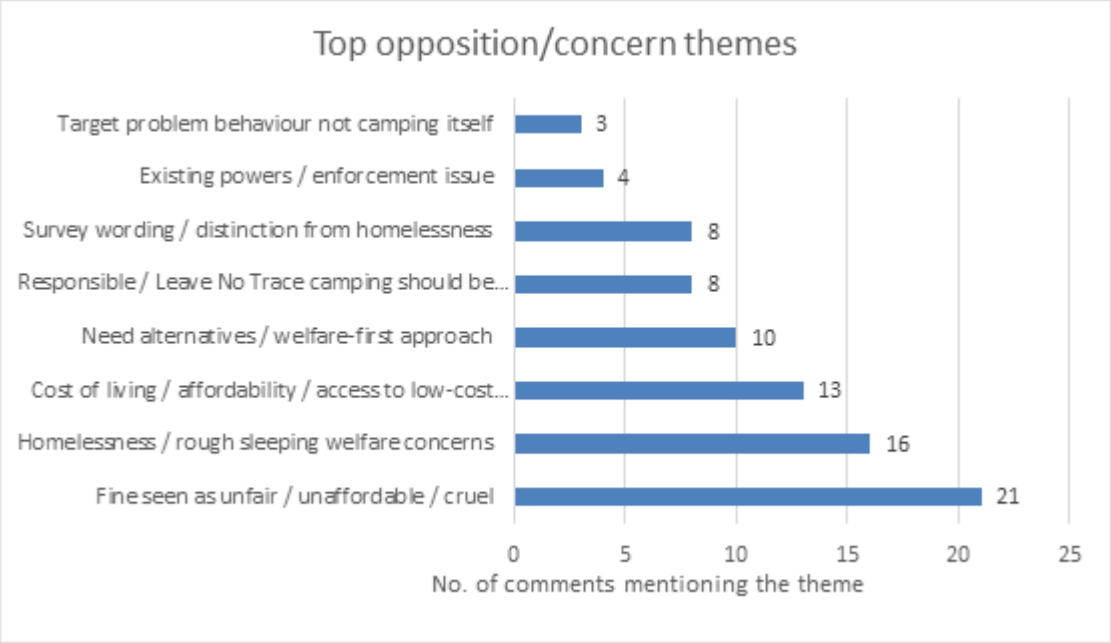
Themes supporting restrictions

Theme	Comments mentioning theme*
Protect Hove Lawns / seafront / beach huts	29
Environmental damage / damage to green spaces	26
Need enforcement / move-on powers / signage	21
Litter / rubbish / waste / cleanliness	20
Public spaces should remain open for everyone	18
Anti-social behaviour / safety / intimidation	18
Human waste / lack of toilets or facilities	13
Support fine / higher penalty	12



Themes opposing or raising concerns about restrictions

Theme	**Comments mentioning theme***
Fine seen as unfair / unaffordable / cruel	21
Homelessness / rough sleeping welfare concerns	16
Cost of living / affordability / access to low-cost recreation	13
Need alternatives / welfare-first approach	10
Responsible / Leave No Trace camping should be allowed	8
Survey wording / distinction from homelessness	8
Existing powers / enforcement issue	4
Target problem behaviour not camping itself	3



Summary of qualitative feedback

Supportive comments largely emphasise that public spaces should remain accessible for everyone and should not be used as locations for tents, camper vans or informal campsites. Respondents frequently reference Hove Lawns, the seafront and beach hut areas, highlighting concerns about litter, human waste, insufficient toilet facilities, anti-social behaviour, obstruction of public spaces and the perceived loss of public amenity.

A strong theme among supporters is the view that managed campsites should be used instead of public lawns, beaches or parks. Many respondents also call for stronger enforcement measures, clearer reporting routes and the use of move-on powers. Some suggest that penalties higher than the proposed £100 fixed penalty notice would be more effective.

Comments expressing opposition or concern focus primarily on homelessness, rough sleeping and welfare considerations. Several respondents state that the survey does not sufficiently distinguish between recreational camping and people sleeping in tents because they have no alternative accommodation. These respondents argue that financial penalties may be unfair, unaffordable and potentially counterproductive for vulnerable individuals.

A smaller but distinct group advocates a more targeted approach. These respondents differentiate between responsible, low-impact camping and behaviours such as fly-camping, littering, excessive noise and longer-term encampments. Suggestions include prioritising welfare support, introducing licensing or charging schemes, and targeting enforcement at specific behaviours rather than relying solely on a blanket restriction.

Respondent profile

Respondent type	Count	Percent
Resident of Brighton & Hove	95	99.0%
A local stakeholder	1	1.0%

Ward profile

Ward	Count	Percent of all responses
Central Hove	19	19.8%
Wish	12	12.5%
Brunswick & Adelaide	11	11.5%
Goldsmid	5	5.2%
Kemptown	5	5.2%
Preston Park	5	5.2%
Westbourne & Poets' Corner	4	4.2%
Hanover & Elm Grove	4	4.2%
Regency	2	2.1%
Queen's Park	2	2.1%
Patcham & Hollingbury	2	2.1%
Rottingdean & West Saltdean	1	1.0%
West Hill & North Laine	1	1.0%
Hangleton & Knoll	1	1.0%
Round Hill	1	1.0%
Hollingdean & Fiveways	1	1.0%
South Portslade	1	1.0%
Westdene & Hove Park	1	1.0%
Whitehawk & Marina	1	1.0%

Conclusion and Recommendations:

Consultation responses provide evidence of activities in public spaces that many residents and visitors consider detrimental to the local area and its amenities. Supporters frequently identify camping, overnight stays in vehicles and informal encampments on locations such as Hove Lawns, the seafront and beach hut areas as contributing to litter, human waste, inadequate sanitation, anti-social behaviour, obstruction and reduced public enjoyment of these spaces. Respondents describe these impacts as persistent and affecting the wider community's ability to use and enjoy public spaces.

Many respondents consider existing arrangements insufficient and support additional controls, enforcement powers and clearer reporting mechanisms. This suggests a public perception that further measures are necessary to prevent or reduce recurring nuisance and detrimental effects associated with these activities.

Some concerns focus on the potential impact on people experiencing homelessness or rough sleeping, with respondents emphasising the importance of distinguishing between recreational camping and those with no alternative accommodation. These comments indicate support for measures that are proportionate, evidence-based and balanced with welfare considerations.

Since the nature of the PSPO is restrictive, considerations include not only evidence but impact. It is not lawful to have a PSPO specifically designed to stop rough sleeping.

Overall, the consultation evidence indicates public concern about activities perceived to have a detrimental effect on the quality of life of those in the locality and on the use and enjoyment of public spaces. As the PSPO focuses on recreational camping, targeting harmful behaviours, and does not target rough sleeping, we are satisfied that statutory tests for a PSPO are met. The wording of the Orders if made will be considered carefully to ensure it is enforceable.

Prohibition Of Unauthorised Overnight Stays In Camper Vans And Other Vehicles: Consultation Response

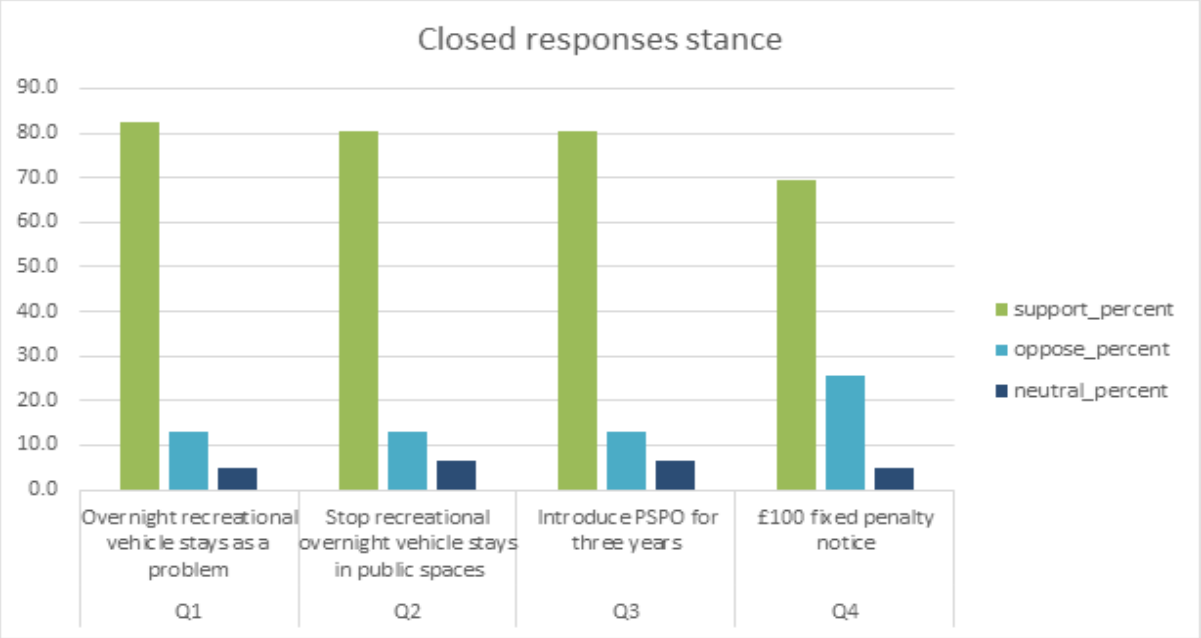
Total responses analysed: 62

Summary

- 62 consultation responses have been received
- 51 respondents (82.3%) agreed or strongly agreed that people staying overnight in vehicles recreationally is a problem, while 8 (12.9%) disagreed or strongly disagreed.
- 50 respondents (80.6%) agreed or strongly agreed that the council should stop people recreationally staying overnight in vehicles in the city's public spaces, while 8 (12.9%) disagreed or strongly disagreed.
- 50 respondents (80.6%) agreed that a PSPO should be introduced for the next 3 years, while 8 (12.9%) disagreed.
- 43 respondents (69.4%) agreed that a £100 fine is fair, while 16 (25.8%) disagreed.

Closed response results

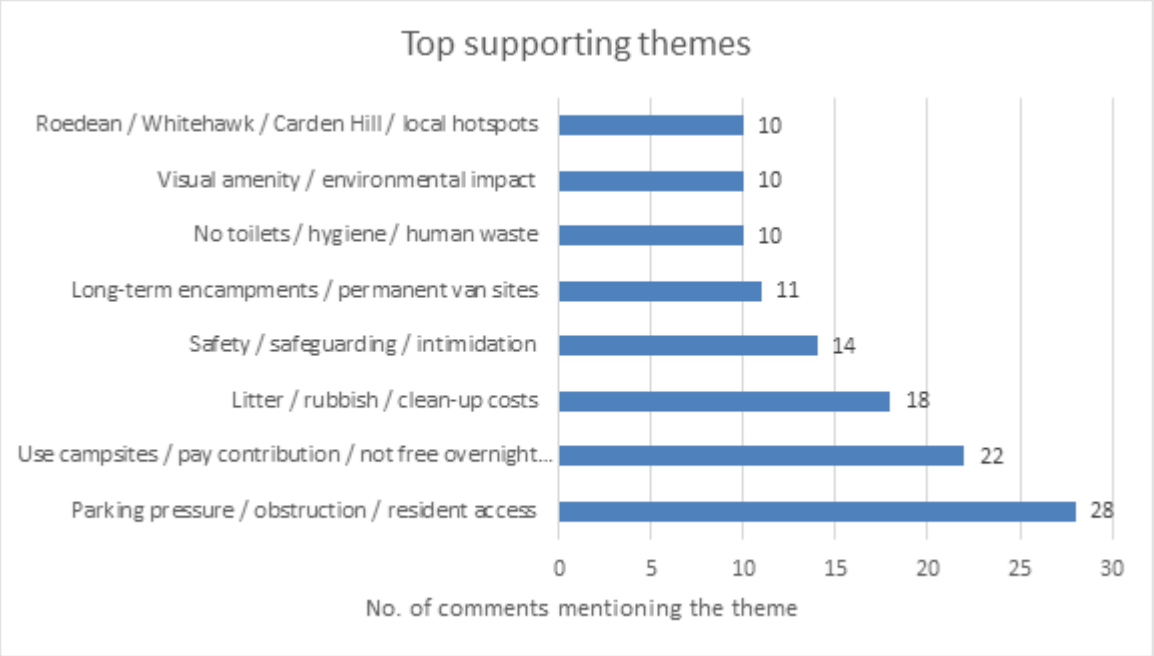
Question	Valid responses	Support / agree	Support %	Oppose / disagree	Oppose %	Neutral / unsure
Q1: Overnight recreational vehicle stays as a problem	62	51	82.3%	8	12.9%	3 (4.8%)
Q2: Stop recreational overnight vehicle stays in public spaces	62	50	80.6%	8	12.9%	4 (6.5%)
Q3: Introduce PSPO for three years	62	50	80.6%	8	12.9%	4 (6.5%)
Q4: £100 fixed penalty notice	62	43	69.4%	16	25.8%	3 (4.8%)



Main qualitative themes

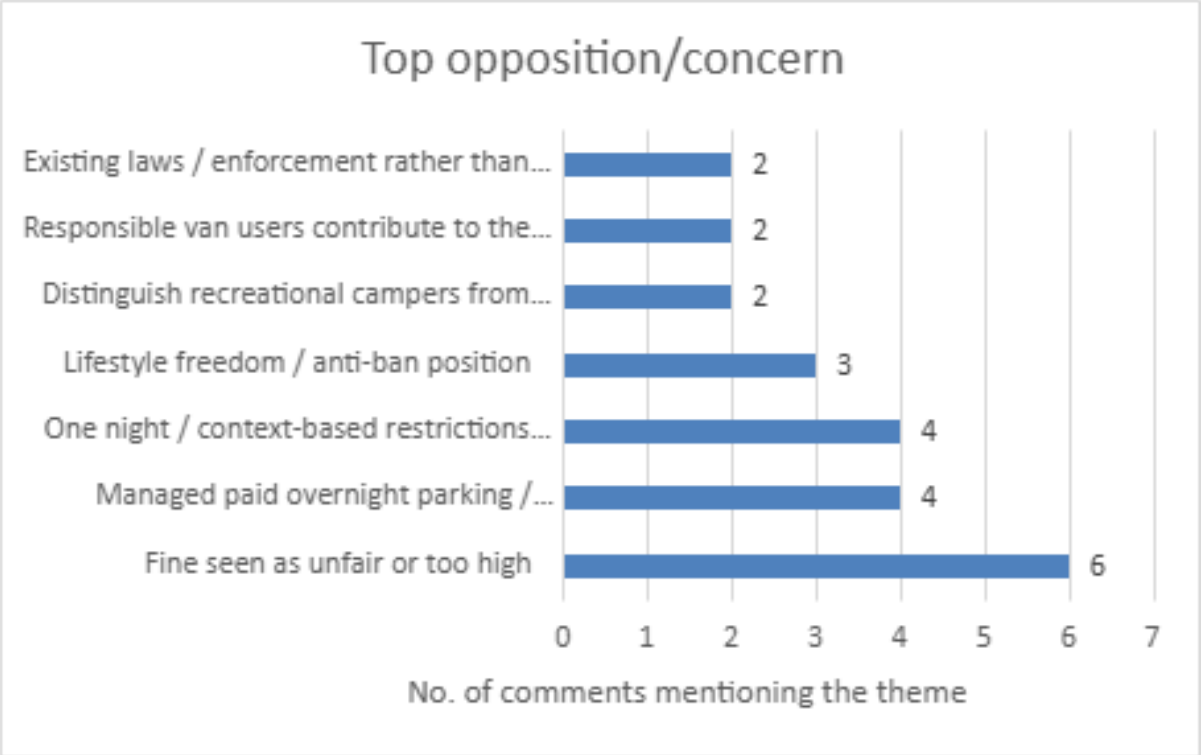
Themes supporting restrictions

Theme	Comments mentioning theme*
Parking pressure / obstruction / resident access	28
Use campsites / pay contribution / not free overnight stays	22
Litter / rubbish / clean-up costs	18
Safety / safeguarding / intimidation	14
Long-term encampments / permanent van sites	11
No toilets / hygiene / human waste	10
Visual amenity / environmental impact	10
Roedean / Whitehawk / Carden Hill / local hotspots	10



Themes opposing or raising concerns about restrictions

Theme	**Comments mentioning theme***
Fine seen as unfair or too high	6
Managed paid overnight parking / designated area preferred	4
One night / context-based restrictions preferred	4
Lifestyle freedom / anti-ban position	3
Distinguish recreational campers from homeless / vehicle dwellers	2
Responsible van users contribute to the city	2
Existing laws / enforcement rather than new PSPO	2



Summary of qualitative feedback

Responses supporting the proposed restriction most frequently referred to the impact of overnight vehicle stays on parking availability, access for residents and visitors, and environmental health issues associated with vehicles remaining in locations without appropriate facilities. Many respondents expressed the view that visitors travelling in campervans or motorhomes should use campsites, designated overnight locations, or paid facilities rather than staying free of charge in public spaces.

A strong location-specific theme emerged in relation to Roedean, Whitehawk, Carden Hill, Black Rock, and other seafront and car park locations. Respondents described concerns including long-term vehicle occupancy, limited access to toilet facilities, littering, human waste, fires and barbecues, reduced enjoyment of public spaces, and safeguarding or safety concerns in proximity to schools and residential areas.

Many respondents who supported the proposal also questioned whether a £100 Fixed Penalty Notice would provide a sufficient deterrent, particularly where the cost remains lower than that of a campsite or other accommodation. Suggestions for additional measures included stronger enforcement activity, height barriers, vehicle removal powers, permit schemes, escalating penalties for repeat offences, and the provision of dedicated paid overnight facilities.

Comments opposing, or expressing reservations about, the proposal generally focused on the need to distinguish between recreational overnight stays and individuals who are living in vehicles or experiencing housing affordability

challenges. Some respondents argued that responsible one-night stays may have limited impact and suggested that a managed overnight parking scheme, designated areas, or more targeted restrictions would be preferable to a blanket prohibition.

Overall, the responses indicate broad support for addressing the impacts associated with overnight vehicle stays in public spaces, while highlighting differing views on the most appropriate enforcement approach and the need to balance environmental, community, and social considerations.

Respondent profile

Respondent type	Count	Percent
Resident of Brighton & Hove	58	93.5%
A local stakeholder	2	3.2%
Other	1	1.6%
A local business	1	1.6%

Ward profile

Ward	Count	Percent of all responses
Whitehawk & Marina	15	24.2%
Preston Park	7	11.3%
Kemptown	5	8.1%
Central Hove	3	4.8%
Hollingdean & Fiveways	3	4.8%
Brunswick & Adelaide	3	4.8%
Goldsmid	2	3.2%
Westdene & Hove Park	2	3.2%
Round Hill	1	1.6%
Wish	1	1.6%
Moulsecoomb & Bevendean	1	1.6%
North Portslade	1	1.6%

Regency	1	1.6%
I don't live in Brighton & Hove	1	1.6%
Hanover & Elm Grove	1	1.6%
Rottingdean & West Saltdean	1	1.6%

Conclusion and Recommendations:

The consultation responses provide evidence that the behaviours targeted by the proposed PSPO have had a detrimental effect on the quality of life of those in the locality. Respondents identified a range of impacts associated with overnight vehicle occupation of public spaces. The impacts described were reported across a number of locations and were characterised by respondents as persistent and recurring rather than isolated incidents.

The consultation also demonstrated broad support for measures to address these issues, although there were differing views regarding the appropriate level of penalty and the need for exceptions or alternative provision in certain circumstances.

Since the nature of the PSPO is restrictive, considerations include not only evidence but impact. It is not lawful to have a PSPO specifically designed to stop rough sleeping.

Having considered the evidence gathered through consultation, together with the wider evidence base and regard to Equality Impacts, it is concluded that the proposed restrictions are proportionate and justified. The restrictions are intended to prevent ongoing detrimental impacts on local communities and public spaces, while remaining targeted to specific behaviours that have been identified as causing harm. We are satisfied that the statutory tests set out in section 59 of the Anti-social Behaviour, Crime and Policing Act 2014 are met and that the making of the PSPO is necessary and proportionate.

Prohibition Of Unauthorised Trading: Consultation Response

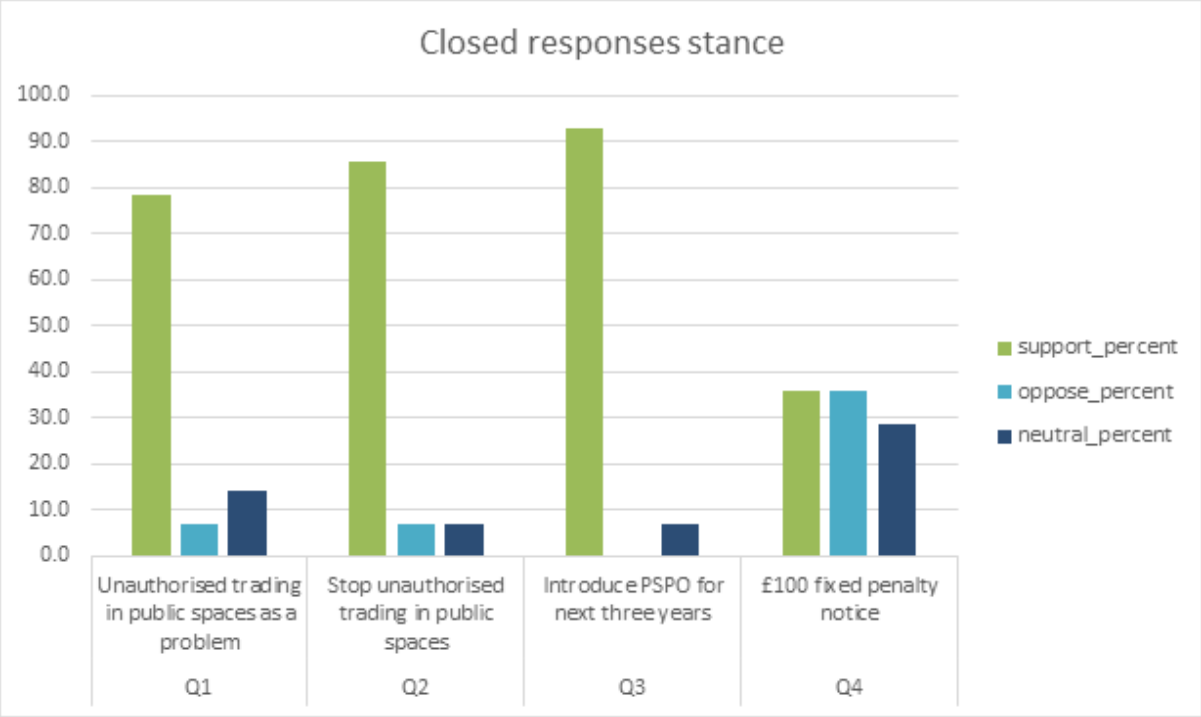
Total responses analysed: 14

Summary

- 14 consultation responses have been received.
- 11 respondents (78.6%) agreed or strongly agreed that unauthorised trading in public spaces causes disruption, nuisance and unfair competition.
- 12 respondents (85.7%) agreed or strongly agreed that the council should stop unauthorised trading in the city's public spaces.
- 13 respondents (92.9%) agreed that a PSPO should be introduced for the next 3 years.
- 5 respondents (35.7%) agreed that a £100 fine is fair, while 5 (35.7%) disagreed.

Closed response results

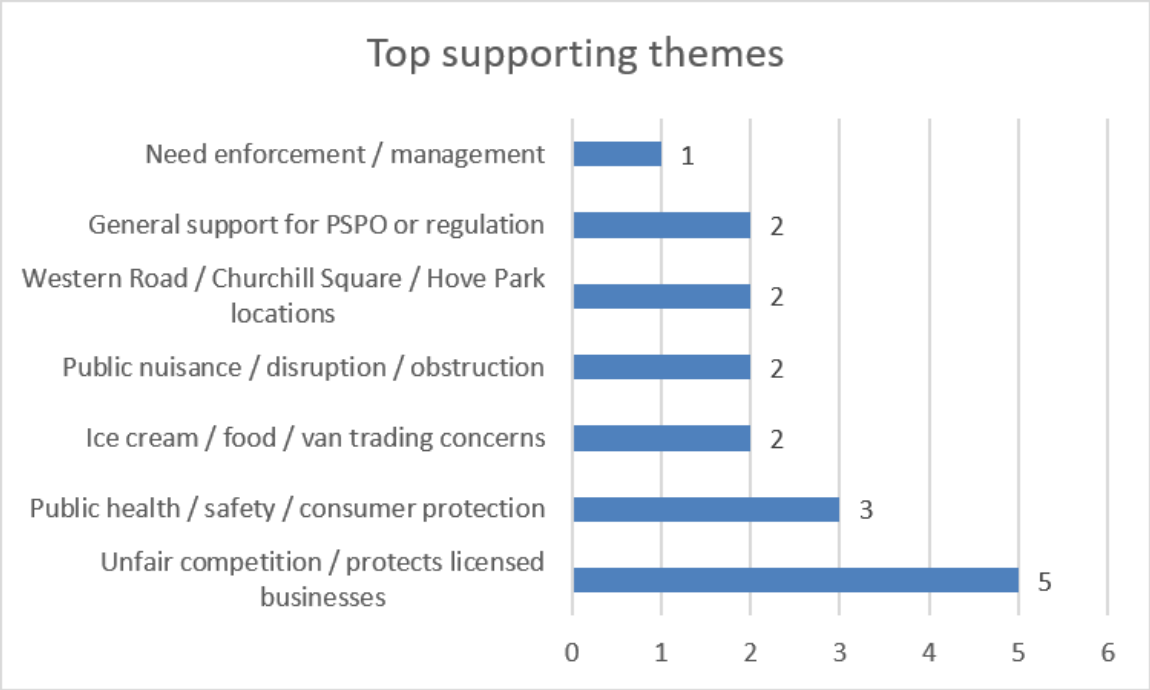
Question	Valid responses	Support / agree	Support %	Oppose / disagree	Oppose %	Neutral / unsure
Q1: Unauthorised trading in public spaces as a problem	14	11	78.6%	1	7.1%	2 (14.3%)
Q2: Stop unauthorised trading in public spaces	14	12	85.7%	1	7.1%	1 (7.1%)
Q3: Introduce PSPO for next three years	14	13	92.9%	0	0.0%	1 (7.1%)
Q4: £100 fixed penalty notice	14	5	35.7%	5	35.7%	4 (28.6%)



Main qualitative themes

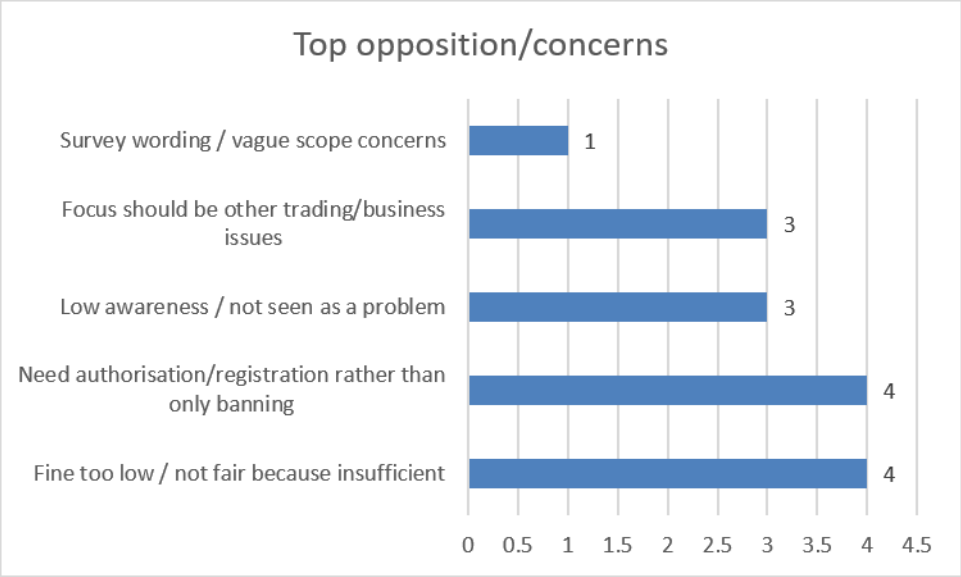
Themes supporting restrictions

Theme	Comments mentioning theme*
Unfair competition / protects licensed businesses	5
Public health / safety / consumer protection	3
Ice cream / food / van trading concerns	2
Public nuisance / disruption / obstruction	2
Western Road / Churchill Square / Hove Park locations	2
General support for PSPO or regulation	2
Need enforcement / management	1



Themes opposing or raising concerns about restrictions

Theme	Comments mentioning theme*
Fine too low / not fair because insufficient	4
Need authorisation/registration rather than only banning	4
Low awareness / not seen as a problem	3
Focus should be other trading/business issues	3
Survey wording / vague scope concerns	1



Summary of qualitative feedback

Supportive comments focus mainly on unfair competition, protection of licensed businesses, and the principle that traders using council land should be authorised and should pay the relevant fees or licences.

Several respondents mention food or van trading, particularly ice cream vans and burger vans. Issues raised include unauthorised trade vehicles, irresponsible parking, running engines, nuisance, smells and impacts on local cafes or shops.

Views on the £100 fine are more mixed than views on the principle of the PSPO. A common concern is that £100 is too low, may be treated as a cost of doing business, and should be increased to create a proper deterrent.

Concern-raising comments include low awareness of unauthorised trading, uncertainty about how the public would know whether a trader is authorised, and concerns that the survey wording and scope are vague. Some respondents support authorisation and registration from a public health, safety and consumer protection perspective, rather than focusing only on penalties.

Respondent profile

Respondent type	Count	Percent
Resident of Brighton & Hove	13	92.9%
A local stakeholder	1	7.1%

Ward profile

Ward	Count	Percent of all responses
Preston Park	2	14.3%
Hollingdean & Fiveways	2	14.3%
Central Hove	2	14.3%
Hanover & Elm Grove	2	14.3%
Westdene & Hove Park	1	7.1%

Conclusion and Recommendations.

The consultation demonstrates strong public support for the proposed measures, 93% of respondents supported the introduction of a PSPO to address unauthorised trading for the next three years.

The consultation also sought views on the proposed Fixed Penalty Notice (FPN) for breaches of the PSPO. Several respondents suggested that a higher penalty would provide a stronger deterrent against unauthorised trading activity.

Based on the consultation findings, supporting evidence, and operational experience, we are satisfied that the statutory tests set out in section 59 of the Anti-social Behaviour, Crime and Policing Act 2014 have been met. The proposed Unauthorised Trading PSPO is a necessary and proportionate measure to help manage unauthorised commercial activity within parks and public spaces.

Prohibition Of Unauthorised Vehicles In Open Public Spaces: Consultation Response

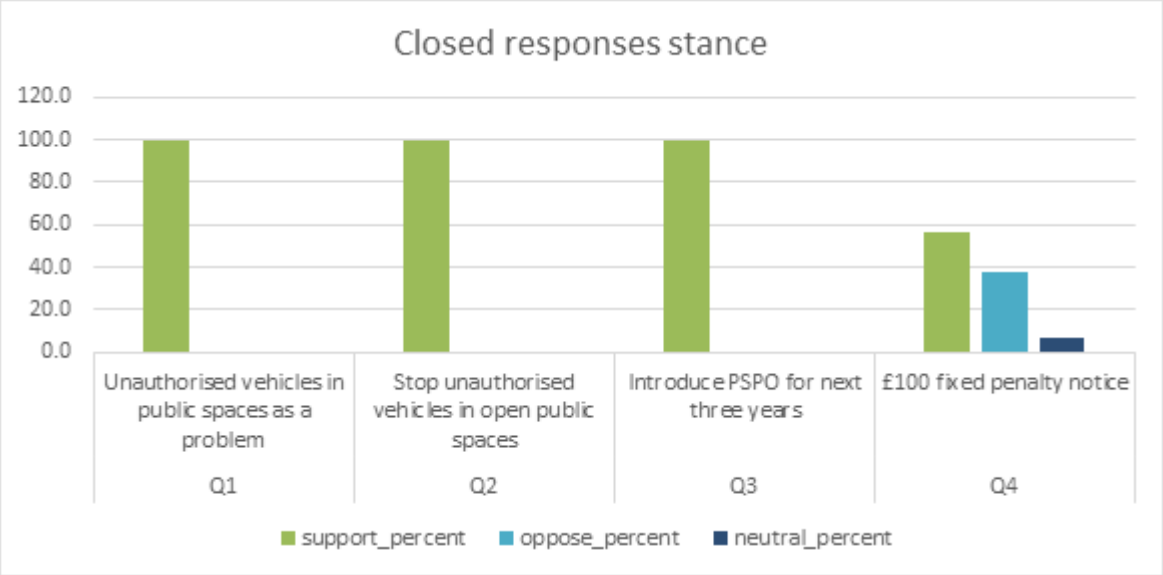
Total responses analysed: 16

Summary

- 16 consultation responses have been received.
- 16 respondents (100.0%) agreed or strongly agreed that vehicles being driven onto public spaces without permission are a problem.
- 16 respondents (100.0%) agreed or strongly agreed that the council should stop unauthorised vehicles in the city's open public spaces.
- 16 respondents (100.0%) agreed that a PSPO should be introduced for the next 3 years.
- 9 respondents (56.2%) agreed that a £100 fine is fair, while 6 (37.5%) disagreed.

Closed response results

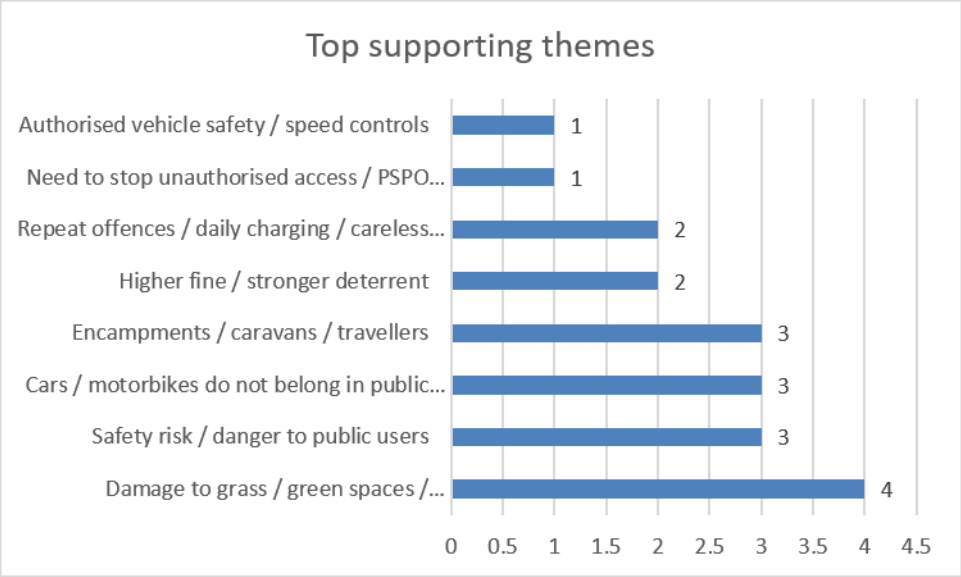
Question	Valid responses	Support / agree	Support %	Oppose / disagree	Oppose %	Neutral / unsure
Q1: Unauthorised vehicles in public spaces as a problem	16	16	100.0%	0	0.0%	0 (0.0%)
Q2: Stop unauthorised vehicles in open public spaces	16	16	100.0%	0	0.0%	0 (0.0%)
Q3: Introduce PSPO for next three years	16	16	100.0%	0	0.0%	0 (0.0%)
Q4: £100 fixed penalty notice	16	9	56.2%	6	37.5%	1 (6.2%)



Main qualitative themes

Themes supporting restrictions

Theme	Comments mentioning theme*
Damage to grass / green spaces / environment	4
Safety risk / danger to public users	3
Cars / motorbikes do not belong in public spaces	3
Encampments / caravans / travellers	3
Higher fine / stronger deterrent	2
Repeat offences / daily charging / careless damage	2
Need to stop unauthorised access / PSPO support	1
Authorised vehicle safety / speed controls	1



Themes opposing or raising concerns about restrictions

Theme	Comments mentioning theme*
Fine level not enough / proportionate concern	5

Summary of qualitative feedback

Responses supporting the proposed PSPO predominantly focus on improving public safety, protecting green spaces, and preventing damage caused by vehicles being driven or parked on public land without authorisation. Respondents provided examples including the use of motorbikes in green spaces, damage to grassed areas by vehicles, and the presence of cars and other vehicles in open public spaces where they are not considered appropriate.

A recurring theme was that unauthorised vehicles can cause both environmental harm and risks to those using public spaces. Some respondents also highlighted concerns relating to encampments, campervans, caravans, and instances of repeated or careless damage to public land.

Views on the proposed £100 Fixed Penalty Notice were more varied than views on the principle of the PSPO itself. While there was broad support for enforcement action, several respondents considered £100 to be insufficient, expressing concern that it could be perceived in the same way as a parking penalty. Suggestions included higher penalties for repeat or deliberate offences, with proposed amounts ranging from £250 to £1,000, or penalties linked to an offender's income.

A smaller number of respondents raised questions regarding implementation. These included whether the restrictions should also address speeding by authorised vehicles, such as contractors operating within public spaces, and whether a

distinction should be made between isolated, low-impact parking adjacent to a road and incidents involving repeated use or damage to land.

Respondent profile

Respondent type	Count	Percent
Resident of Brighton & Hove	15	93.8%
A local stakeholder	1	6.2%

Ward profile

Ward	Count	Percent of all responses
Preston Park	2	12.5%
Westdene & Hove Park	1	6.2%
West Hill & North Laine	1	6.2%
Hollingdean & Fiveways	1	6.2%
Brunswick & Adelaide	1	6.2%
Central Hove	1	6.2%
Kemptown	1	6.2%
North Portslade	1	6.2%

Conclusion and Recommendations:

The consultation demonstrates strong public support for the proposed measures, with 100% of respondents supporting the introduction of the Unauthorised Vehicles PSPO. This reflects the level of concern among residents regarding the impact of unauthorised vehicle use within parks and open spaces, including damage to infrastructure and landscapes, potential risks to public safety, and disruption to the enjoyment of these areas by other users.
Respondents expressed support for effective enforcement of the proposed restrictions. including the use of a £100 Fixed Penalty Notice. Some respondents commented that they considered the penalty level to be too low and felt that a higher penalty may provide a stronger deterrent against breaches of the PSPO.

Based on the consultation findings, supporting evidence, and operational experience, we are satisfied that the statutory tests set out in section 59 of the Anti-social Behaviour, Crime and Policing Act 2014 have been met, the proposed

Unauthorised Vehicles PSPO is a necessary and proportionate measure to protect parks and open spaces.

[i] Please note that AI has been used to support the summary analysis of the free text responses to the Your Voice survey. This is denoted by * Asterisks in this document. Officers have read all individual responses, and AI has been used to support the collation of themes and support the phrasing of summaries.

Appendix 5:

Public Spaces Protection Order: Consultation For Renewal Of Gating Schemes 2026 Responses

Consultation on proposals to renew the existing Public Spaces Protection Order (PSPOs) Gating Schemes was carried out in accordance with statutory requirements, contacting the people/groups set out below and publicising the proposed orders on site with a 28-day response period for each.

The consultation was conducted during the period of 13th July 2026 to 10th August 2026.

1. Note on Renewal Of Existing Scheme and Overall Summary

1.1. It is important to recognise that, where a PSPO Gating Scheme is introduced for the first time, resident testimony and supporting evidence would typically demonstrate that crime, antisocial behaviour and community harm are occurring both within and around the affected area. However, when considering the renewal of an existing scheme, particularly one that has been successful, a reduction in such incidents within the gated area would be expected. In these circumstances, it is necessary to make a reasonable assessment of the level of protection provided by the PSPO and to consider the likely impact should those restrictions be removed. The consultation responses and conclusions relating to the Gating Schemes have been considered in this context.

1.2. A PSPO analysis has been undertaken to assess levels of police-recorded crime both within and in the immediate vicinity of the gated public spaces. The findings demonstrate that significant levels of crime continue to persist within the wider neighbourhood. This supports the conclusion that removal of the PSPO restrictions would create a substantial risk of crime, antisocial behaviour, and associated harms returning to areas currently protected by the Gating Schemes. Due to data protection concerns this analysis is for information only and is not for public dissemination.

1.3. Consultation feedback strongly supports the renewal of the PSPOs relating to gated public spaces at the six existing locations. The evidence indicates that statutory tests continue to be met and that the restrictions provide residents with

significant protection from serious crime, antisocial behaviour and the wider harms associated with such activity.

Scheme title	Pool Passage PSPO
Description	The existing Pool Passage PSPO permits a gated highway restriction at the junction of Pool Passage and Pool Valley, which can be locked between the hours of 7pm and 9am each day. The upkeep, maintenance and repair of the gate as well as responsibility for locking/unlocking sits with the residents within the affected area.
Background	The existing Pool Passage PSPO which was granted in 2022 formed a response to the serious and threatening nature of the criminal and antisocial activities experienced at that time, which include drug taking and dealing, street fouling, intimidating behavior and making threats toward residents and damage to and entering property.
Statutory consultation responses:	
Sussex Police	“I have had a search for jobs in Pool Passage since the installation of the gate at the Pool Valley end and can only see one report that we attended in 2025 and none year to date. I feel the installation of the gate can only be viewed as a positive from a policing perspective and on engaging with residents they have said that their quality of life has dramatically improved and negated the need to consistently call 999/101 to report unsavoury activity. None of the businesses in the surrounding area have cited the gate as a hinderance or inconvenience in their daily activities and I am of the opinion that it should remain in situ until the next gate review.”
Sussex PCC	None received
Ward councilors	“I know residents will be keen to keep this in place, so I hope that’s the option we go for.” “I know that the previous ward councilors worked quite hard to get the gates in place for residents, so I'd imagine they'd be keen for it to stay.”
Residents/traders within the affected area	“As confirmed to you recently we would like the gate PSPO renewed, as it has stopped most of the Anti-social behaviour in Pool Passage. Also the residents and workers of Pool Passage we spoke too, would also like the PSPO renewed as it Has made the lives of residents and workers more tolerable with the reduction of the past anti-social behaviour. All of us have benefited from the installation of the gate and it has had a positive effect on our health and welfare.”
Equalities and access	As an access restriction, the proposed order has the potential to impact upon those with additional access needs or disabilities.

	Because the passage does not form a useful through route, and the extreme narrowness (just 75cm at the narrowest point) however, the impact on those not accessing property along the passage is felt to be limited – particularly is this proposal is for a night-time only gated scheme. All properties along the passage have been contacted with specific enquiries around the access implications of this proposal and have not raised any concerns. Alternative routes from Pool Valley to Old Steine which are wider, better lit, safer and with better surfacing are readily available and do not incur any greater distance or inconvenience. This is a renewal of an existing scheme which has been in place since 2022 and no issues around accessibility or other equalities concerns have been raised during this time or within the recent public consultation
Recommendation	To renew the existing order

Scheme title	**Brunswick Row PSPO**
Description	The existing Brunswick Row PSPO permits a gated highway restriction on Brunswick Row with gates placed at its junctions with Ditchling Road and Queens Place which can be locked between the hours of 6pm and 8am each day. The upkeep, maintenance and repair of the gates as well as responsibility for locking/unlocking sits with the residents within the affected area.
Background	At the time of the first gating restriction, recently reported crime included drug dealing, a serious sex offence and intimidation and harassment of residents. The purpose of the gating scheme was to reduce the amenity of Brunswick Row and Queens place as an escape route, drug dealing venue and gathering space for disorderly groups, and to offer protection for residents reducing the impact of these behaviours on themselves and their homes.
Statutory consultation responses:	
Sussex Police	None received
Sussex PCC	None received
Ward councilors	“I’d be very surprised if ASB had subsided in these areas…. London Road and The Level continue to have lots of trouble. Groups of young people terrorising the area was high on the at the LAT last Tuesday.”
Residents/traders within the affected area	“I would very much like the PSPO to continue - it’s an excellent arrangement and makes us feel completely secure in our living space. No changes to hours of implementation are needed.”

	"As owner occupier at XXX Brunswick Row I wanted to confirm that this PSPO needs to be maintained and to advise that I will assist in the maintenance expected in the terms of the agreement"
Equalities and access	As an access restriction, the proposed order has the potential to impact upon those with additional access needs or disabilities, however, the impact on those not accessing property along the passage is felt to be limited – particularly is this proposal is for a night-time only gated scheme. All properties along the passage have been contacted during the consultation of this proposal and have not raised any concerns. Alternative routes via Queens Place or Oxford Place are available and do not incur any greater distance or inconvenience. This is a renewal of an existing scheme which has been in place since 2006 and no issues around accessibility or other equalities concerns have been raised during this time or within the recent public consultation
Recommendation	To renew the existing order

Scheme title	**Oxford Court PSPO**
Description	The existing Oxford Court PSPO permits a gated highway restriction at its junction with Oxford Street which is locked at all times with access provided for those properties adjoining the affected area. The upkeep, maintenance and repair of the gate sits with the St Peters Medical Practice and residents within the affected area.
Background	The existing Oxford Court PSPO which was granted in 2021 formed a response to the serious and threatening nature of the criminal and antisocial activities experienced at that time, which include drug taking and dealing, street fouling, intimidating behavior and making threats toward residents and damage to property.
Statutory consultation responses:	
Sussex Police	None received
Sussex PCC	None received
Ward councilors	"I'd be very surprised if ASB had subsided in these areas…. London Road and The Level continue to have lots of trouble. Groups of young people terrorising the area was high on the at the LAT last Tuesday."

Residents/traders within the affected area	I can confirm, we, XXXX Resident GP Practice, and, Deputy Director Estate Management & Assurance of Sussex Partnership NHS Foundation Trust, who have counselling rooms in the surgery, all agree that the gate is very much still required to protect the surgery/residences/businesses who use the gate, with the maintenance position remaining as we agreed with you under Point 5 of the existing Order Business backing on to the passage submitted verbally at a site meeting that they very much value the gate which has eliminated drug misuse and other antisocial behaviour taking place along the passage, which had previously been a common occurrence.
Equalities and access	As an access restriction, the proposed order has the potential to impact those with additional access needs or disabilities. Because the passage does not form a useful through route and just leads to then rear of properties adjoining the affected area, this is not felt to offer any access implications. This is a renewal of an existing scheme which has been in place since 2021 and no issues around accessibility or other equalities concerns have been raised during this time or within the recent public consultation
Recommendation	To renew the existing order

Scheme title	**St James Court PSPO**
Description	The existing St James Court PSPO permits a gated highway restriction at its junction with George Street which is locked at all times with access provided for those properties adjoining the affected area and additional access via the norther entrance to the twitten. The upkeep, maintenance, and repair of the gate sits with the residents within the affected area.
Background	The existing St James Court PSPO formed a response to the serious and threatening nature of the criminal and antisocial activities experienced at that time, which include drug taking and dealing, street fouling, intimidating behavior and making threats toward residents and damage to property.
Statutory consultation responses:	
Sussex Police	“I have been one of the Kemptown PCSOs for almost 4 years now and have not had any complaints or issues at St James’s Court. Having looked at our systems there was 1 report in 2023 regarding this location, detailing some ongoing ASB, and nothing else relevant since.

	In my opinion, I think the gate is contributing heavily to a reduction in reports and is an excellent preventative measure. The alleyway is very discreet and secluded, so would likely be used for drug dealing/drug use/ASB without the gate, due to the proximity to ST JAMES'S STREET and surrounding problem accommodations. Overall, I support the gate remaining in this location."
Sussex PCC	None received
Ward councilors	None received
Residents/traders within the affected area	"I recently received your letter regarding the review of the gate at St James Court. On behalf of myself at No XXX and my Neighbour, we would very much like to keep the gate in place. We are happy to continue maintaining it ourselves." Manager at the Queens Arms "There had been a terrible drug problem with needles and all sorts and since the gate has gone up it has been amazing and it would be a travesty if it were removed" "In answer to your letter I must say that the gate has been a godsend…. Before the gate was installed we were plagued by people using it as a toilet and rubbish dump, drug using or purchasing, thieves bringing their 'stealings' in and disposing of purses etc… down our only drain, and somewhere to have sex! So you see how important it is for us to have it and keep it."
Equalities and access	As an access restriction, the proposed order has the potential to impact upon those with additional access needs or disabilities. Because the passage does not form a useful through route and just leads to properties adjoining the affected area, this is not felt to offer any access implications. This is a renewal of an existing scheme and no issues around accessibility or other equalities concerns have been raised during this time or within the recent public consultation
Recommendation	To renew the existing order

Scheme title	**Farman Street PSPO**
Description	The existing Farman Street PSPO permits a gated highway restriction at its junction with Western Road which can be locked between the hours of 9pm and 8am each day. The upkeep,

	maintenance and repair of the gate as well as responsibility for locking/unlocking sits with the residents within the affected area.
Background	The existing Farman Street PSPO was granted in 2014. Farman Street forms a pedestrian path which links Western Road with Cross Street. At the Western Road end, the footpath passes beneath the first floor of 6 Western Road forming a short tunnel. Western Road is home to significant street activity and nighttime economy outlets, as well as drug and alcohol misuse, street fouling and rough sleeping, with Farman Street generally and the covered section in particular being very vulnerable to misuse, disorder and criminal activity spilling into the street from Western Road At the time of the first gating restriction, recently reported crime included drug dealing and use, violence and disorder, criminal damage and intimidation and harassment of residents.
Statutory consultation responses:	
Sussex Police	None received
Sussex PCC	None received
Ward councilors	“Yes v keen for this PSPO to continue. Residents have been doing some fundraising and also getting quotes for replacement /repair….We have included a contribution to gate repair /refurb in our CIL list”
Residents/traders within the affected area	“Thank you for your letter regarding the review of the Public Space Protection Order in place on Farman Street. As a long-term resident of a property in XXXX Farman Street, I can certainly assure you that the gate has been a massive game changer from what the situation had been prior to the protection order being put in the place. Bringing home my then young children to see needles, drug taking/dealers, violence and more right on my doorstep was unbearable. The gate however has not been a silver bullet, and we still occasionally have sporadic issues of drug dealing/ drug taking in the alleyway but at a heavily reduced rate as the dealers feel trapped if the gate is closed. Should the gate ever be removed then criminal and antisocial behaviour would, in no doubt, return. Sadly, also as this sort of behaviour appears to be on the rise in Brighton, the problem would probably be worse than it was originally. Therefore, I for one wholeheartedly support retaining the PSPO for Farman Street.” “The gate is still very much needed on the Western Road side to stop people using the ally as a place to hang out and often urinate! Unfortunately the lock has been broken for some time so it is less effective”

Equalities and access	As an access restriction, the proposed order has the potential to impact upon those with additional access needs or disabilities, however, the impact on those not accessing property along the passage is felt to be limited – particularly is this proposal is for a night-time only gated scheme. All properties along the passage have been contacted during the consultation of this proposal and have not raised any concerns. Alternative routes via Little Western Street or Waterloo Street are available and do not incur any greater distance or inconvenience. This is a renewal of an existing scheme which has been in place since 2014 and no issues around accessibility or other equalities concerns have been raised during this time or within the recent public consultation
Recommendation	To renew the existing order

Scheme title	**Nelson Row PSPO**
Description	The existing Nelson Row PSPO permits gated highway restrictions at its junction with Kingswood Street to the south and the northern boundary of the Millwood Centre to the north. Each gate includes a pedestrian access which is always unlocked and a vehicle access which is always locked but can be accesses for emergency and maintenance vehicles, The upkeep, maintenance and repair of the gate sits with housing management Estates Services.
Background	The Nelson Row scheme was first put in place in 2024, following concerns around dangerous motorcycle riding through the estate, which had become more intense following the rise of food delivery services and the intensification of student housing in the area. Motorcycle use was having a serious impact on children's safety as well as disorder as residents and motorcyclists came into increasing conflict with a violent confrontation in which a resident was injured. The purpose of the gating scheme was to reduce the likelihood of motorcyclists using the path as a cut through, by placing gates which would need to be opened manually at either end. This was aimed at reducing conflict and offering protection to residents and particularly children using the playground from conflict or contact with motorcyclists.
Statutory consultation responses:	
Sussex Police	None received

Sussex PCC	None received
Ward councilors	None received
Residents/traders within the affected area	At a community meeting attended by the Community Engagement Team, residents from the Millwood Management Committee were strongly in favour of the scheme staying in place and referenced the initial concerns around motorcycles cutting through the estate and danger to children presented by unrestricted access onto Kingswood Street
BHCC Housing/ Community Engagement	“Although because of the building works between Christmas 2024 and summer 2026, this scheme has been hard to evaluate, now that it has become operational again it offers clear benefits to residents in terms of safety for themselves and their children, reduced conflict between motorcycle users cutting through and improves the estate grounds encouraging more positive use for all residents.”
Equalities and access	As an access restriction, the proposed order has the potential to impact upon those with additional access needs or disabilities. However, the impact on those accessing Nelson Row is felt to be minimal as the pedestrian gates are unlocked at all times. All properties along the passage have been contacted during the consultation of this proposal and have not raised any concerns. Alternative routes for motorcycles are available via Circus Street and Morely Street This is a renewal of an existing scheme which has been in place since 2024 and no issues around accessibility or other equalities concerns have been raised during this time or within the recent public consultation
Recommendation	To renew the existing order

Brighton & Hove City Council

Cabinet

Agenda Item 55

Subject: **Skills Bootcamps Funding**

Date of meeting: **Thursday, 17 September 2026**

Report of: **Cabinet Member for Children, Families and Youth Services**

Lead Officer: **Corporate Director for Families, Children and Wellbeing**

Contact Officer: **Name: Carla Butler, Donna Keenan**

Email: carla.butler@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key: Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000 and is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

1.1 This report seeks Cabinet approval to apply contract extensions of one year to the wave 6 skills bootcamp contracts awarded in 2025 as additional funding of £1.68m has recently been made available from the Department of Work and Pensions to the council. The 2025 contracts were approved through the Annual Procurement Forward Plan in February 2025. These contracts are valid until the 30 September 2026, and they included the flexibility to exercise rights to extend contracts by up to two years. The decision will enable the council to continue to deliver high-quality, flexible skills bootcamp training that responds to local employer demand, supports residents aged 19+ to gain sector-specific skills, and improve access to interviews, employment, progression or new work opportunities.

1.2 The proposal directly supports the Brighton and Hove Economic Plan 2024 - 2027 core imperatives – to build a stronger, more inclusive labour by ensuring residents and employers benefit from the provision of employment and skills support which is linked directly to the needs and opportunities within the local economy. It also supports the Council Plan "A better Brighton & Hove for all" by supporting the priorities of a fair and inclusive city, a healthy city where people thrive, and a city to be proud of. Skills Bootcamps help reduce inequality by widening access to learning and employment, strengthen the local economy by addressing skills gaps in priority sectors, and support residents and businesses to benefit from inclusive and sustainable growth. Bootcamps are sited as a key deliverable of the Get

Sussex Working Plan (GSWP). Ambition 6 – to develop and upskills our workforce to boost employment and growth. The GSWP is overseen by the Growth Board, it was endorsed by Cabinet and adopted by the Department for Work and Pensions in October 2025

2. Recommendations

2.1 Cabinet agrees to approve the extension of the contracts for the delivery of Skills Bootcamps in Brighton & Hove for a period of one year to 30 September 2027 to enable the additional grant funding of £1.68m to be utilised.

2.2 Cabinet delegates authority to the Corporate Director for Families, Children and Wellbeing, in consultation with the Cabinet Member for Children, Families and Youth Services, to take all necessary steps to implement, manage and vary the Skills Bootcamp contracts within the available grant funding..

3. Context and background information

3.1 Skills Bootcamps are flexible, employer-led training courses for adults aged 19 and over. They are designed to help residents develop sector-specific skills in areas where there is employer demand, with delivery typically lasting up to 16 weeks and an offer of a job interview or progression opportunity on completion. They provide a rapid route for adults to retrain, upskill or progress in work, while helping employers address skills gaps in priority sectors.

3.2 Brighton & Hove City Council's original Skills Bootcamps grant allocation for 2026-27 was £1.5 million. The council has now been notified of an uplift to this allocation. The Department for Work and Pensions has confirmed that, due to headroom in the 2026-27 Skills Bootcamps budget, the council's allocation can be increased this year. This is in addition to the further Construction Skills package funding that the council was recently contacted about to gauge local interest and delivery capacity.

Funding element	**Amount**
Additional allocation	£1,500,000
Additional Construction Skills package funding	£168,745
Total additional funding	**£1,668,745**
Revised grant total funding	**£3,168,745**

3.3. The DWP will be issuing a grant variation letter confirming the allocation uplift in due course. However, the council has been advised to treat the notification on 6 August 2026 as confirmation that it can engage with suppliers and begin planning the additional delivery required within the 2026-27 delivery year. For clarity, the Construction Skills package funding must be used to support delivery in the construction sector. The specific conditions of the original Grant Offer remain unchanged for the additional allocation. The council is permitted to use up to 50% of the delivery cost

element to deliver Skills Bootcamps in any sector needed locally outside the Skills England identified priority sectors of Advanced Manufacturing, Clean Energy, Digital Technologies, Life Sciences, Creative Industries, Financial Services and Defence, plus Construction and Health and Social Care.

3.4. The council's £1.5 million Skills Bootcamps allocation for 2026-27 has already been procured as one-year contracts. This procurement activity was authorised through the Annual Procurement Forward Plan on 19th March 2026, which secured a range of local provision aligned to employer demand and national Skills England priority sectors, enabling residents to access short, intensive training with a clear route to interviews, employment, progression or new opportunities. The additional £1.68 million allocation therefore cannot be accommodated within the current 2026-27 procured value. However, it is possible to extend the contracts that were procured in 2025/26 as they have not expired. This will ensure the additional funding can be delivered compliantly and at pace.

4. Analysis and consideration of alternative options

4.1 The recommended option is to approve the exercising of the right to extend the 2025-26 contracts to enable Skills Bootcamps delivery. This is recommended because the original £1.5 million allocation has already been procured and committed, and the additional funding cannot be delivered within the 2026-27 contracts. Approval will allow the council to respond quickly to the Department for Work and Pensions' funding uplift, maintain compliance with procurement requirements, secure delivery capacity from the provider market, and maximise the benefit of the additional grant for residents and employers across the city.

4.2 An alternative option would be to decline the additional funding. This is not recommended because it would reduce the opportunity to increase access to training, limit the council's ability to respond to local skills needs.

5. Community engagement and consultation

5.1 The council was notified of the additional Skills Bootcamps funding on 6 August 2026. Since receiving the notification, the Skills & Employment team has mobilised quickly to assess the implications of the uplift, review existing delivery commitments, consider provider capacity and prepare the necessary governance and contracting activity to enable the additional funding to be used effectively within the 2026-27 delivery year.

5.2 The programmes delivered will be shaped by priorities set out in the Local Skills Improvement Plan for Sussex, the Get Sussex Working Plan, local labour market intelligence and evidence of current learner and employer demand, ensuring that additional provision is targeted where it can have the greatest impact for residents, employers and the local economy.

6. Financial implications

6.1 The council has been notified of additional Skills Bootcamps grant funding of £1,668,745 for 2026-27, comprising £1,500,000 additional allocation and £168,745 Construction Skills package funding. This increases the total Skills Bootcamps grant allocation to £3,168,745. The funding is external grant funding from the Department for Work and Pensions and must be used in

accordance with the relevant grant conditions. The proposals in this report seek approval to apply contract extensions to 6 contracts with a maximum value per contract of £450k to enable the additional allocation to be committed and delivered within the available grant funding. There will be no additional pressure on the council's general fund budget unless providers over deliver. This will be closely managed to ensure expenditure remains within the confirmed grant envelope and in line with grant conditions. Financial monitoring will be undertaken through existing budget management and contract monitoring arrangements to manage any risk of underspend, delivery slippage or expenditure outside eligible grant activity.

Name of finance officer consulted: Hannah Birch Date consulted (10/08/2026):

7. Legal implications

7.1 The contracts for the delivery of Skills Bootcamps are call-off-contracts awarded under a Dynamic Purchasing System procured in accordance with the Public Contracts Regulations 2015 (PCR 2015). Any modification to those contracts must comply with Regulation 72 PCR 2015.
Regulation 72 (1)(a) permits contract modifications where they have been provided for in the initial procurement documents through clear, precise and unequivocal review clauses or options, provided that the scope and conditions of the modification are specified and that the modification does not alter the overall nature of the contract. The procurement documentation for the relevant call-off competitions included the option to extend the contracts. The contracts also contain provisions permitting extension which are consistent with the original procurement documentation. The proposed extensions do not alter the overall nature of the contracts and are made in accordance with the provisions set out in the original procurement documentation. The proposed extensions are therefore considered lawful under Regulation 72 (1) (a) of the PCR 2015.

Name of lawyer consulted: Sian Stevens Date consulted (03/09/26):

8. Risk implications

8.1 The key risks relate to the compressed timescale for extending contracts and mobilising additional delivery within the 2026-27 funding year, supplier capacity to respond at pace, and ensuring activity remains compliant and delivers value for money. If the recommendations are not agreed, there is a risk that the council will be unable to utilise the additional grant allocation, reducing the number of residents able to benefit from Skills Bootcamps and limiting support to employers with current skills shortages.

8.2 The risk will be managed through engagement with our 2025-26 training providers, clear delivery specifications, monitoring against grant conditions and regular contract management.

9. Equalities implications

9.1 The procurement of additional Skills Bootcamps provision will support the council's duty to advance equality of opportunity by increasing access to flexible, employment-focused training for residents aged 19+, including those who may face barriers to learning, work or progression. Providers will be expected to demonstrate how their delivery model supports inclusive access, appropriate learner support and positive outcomes for underrepresented groups.

9.2 The additional provision will be shaped by local labour market intelligence, learner demand and employer need. This will help ensure that opportunities are targeted where they can support residents to gain skills, access interviews, progress in work or move into employment. Any equality considerations arising through the procurement process will be managed through the specification, provider assessment and contract monitoring arrangements.

10. Sustainability implications

10.1 The procurement of additional Skills Bootcamps provision has the potential to support positive sustainability outcomes by increasing access to skills in sectors linked to the transition to a more sustainable and resilient local economy, including clean energy, construction and other priority sectors where there is evidenced employer demand. Providers will be expected to consider sustainable delivery approaches, including efficient use of resources, accessible local delivery where appropriate, and minimising unnecessary travel through blended or flexible learning models. Any negative sustainability impacts are expected to be limited and will be managed through the procurement specification.

11. Health and Wellbeing Implications:

11.1 The procurement of additional Skills Bootcamps provision is expected to have positive health and wellbeing implications by supporting residents to gain skills, improve confidence and access employment or progression opportunities. Employment and learning are wider determinants of health, and improved access to good-quality training can support financial resilience, independence and wellbeing for residents. Provision will be targeted in line with local demand and learner need, with providers expected to offer appropriate support to help residents overcome barriers to participation and achieve positive outcomes.

Other Implications

12. Procurement implications

12.1 The additional Skills Bootcamps funding requires contract extensions as the original £1.5 million allocation has already been procured and committed. Contract extensions will be undertaken in accordance with the Council's Contract Standing Orders, relevant procurement legislation, and grant funding requirements, using appropriate procurement routes to secure compliant, timely and value-for-money delivery.

The contract extension process will support engagement, clear specification of delivery requirements and contract management arrangements to ensure delivery remains aligned with grant conditions, learner outcomes, employer demand and value-for-money requirements.

In line with the Social Value Act 2012, the Council will seek to maximise the social, economic and environmental benefits arising from these contracts for Brighton & Hove. Social value considerations will be embedded throughout the contract extension process and contract delivery, including the promotion of local employment and skills opportunities, inclusive access to training, and engagement with local employers and communities. A Social Value Action Plan will be used to monitor, measure and report on social value outcomes, ensuring transparency, accountability and the successful delivery of commitments.

13. Crime & disorder implications:

13.1 The contract extensions of additional Skills Bootcamps provision is expected to have a positive impact on the council's duties under Section 17 of the Crime and Disorder Act 1998. By increasing access to skills development, training and employment opportunities, the programme can help address some of the underlying social and economic factors associated with crime, anti-social behaviour and reoffending, including unemployment, low skills levels and social exclusion. Skills Bootcamps will support residents aged 19+ to gain skills that improve access to sustainable employment and career progression, contributing to greater economic resilience and social inclusion. Any specific community safety considerations arising through programme delivery will be managed through the procurement process, provider selection and ongoing contract monitoring arrangements.

14. Conclusion

14.1 The additional Skills Bootcamps funding provides a significant opportunity to expand local skills provision, respond to employer demand and support more residents to access training, interviews, employment and progression opportunities. As the original £1.5 million allocation has already been procured and committed, contract extensions will enable us to deliver the additional funding compliantly, secure value for money and maximise the benefit of the revised grant allocation within the 2026-27 delivery year.

Brighton & Hove City Council

Cabinet Agenda Item 56

Subject: **Seafront Lease: Brighton Wheel Proposal**

Date of meeting: **17th September 2026**

Report of: **Corporate Director City Operations**

Contact Officer: **Toni Manuel**
Email: toni.manuel@brighton-hove.gov.uk

Ward(s) affected: **Kemptown**

Key Decision: Yes

Reason(s): Over £1m

For general release

1. Purpose of the report and policy context

1.1 This report seeks Cabinet approval to award a new 25-year lease, subject to Planning consent, to the current tenant for the reinstatement of the Brighton Wheel on its former site at Madeira Drive – see site plan Appendix 1 at the end of this report. The proposal would secure a significant increase in rental income for the council, support delivery of the Seafront Prospectus and wider regeneration ambitions for the Eastern Seafront and provide a major visitor attraction at no capital cost or operational risk to the council.

1.2 The proposal aligns with the council's objectives to support economic growth, increase commercial property income, enhance the visitor economy and deliver visible improvements along the seafront. The return of the Brighton Wheel would complement existing attractions, increase footfall to the eastern seafront and contribute to the long-term vitality and attractiveness of the area.

2. Recommendations

2.1 That Cabinet agrees to grant a new 25-year lease to the existing tenant for the reinstatement and operation of the Brighton Wheel on its former site at Madeira Drive, subject to planning permissions, statutory consents, matters referred to in this Part 1 report and the lease terms and matters set out in the Part 2 report.

2.2 That Cabinet delegates authority to the Director City Operations in consultation with the Director Property & Finance and Cabinet Member for Economy, Culture, Heritage and Tourism to finalise and enter into all necessary legal agreements and associated lease documentation required to implement the proposal.

3. Context and background information

3.1 The Brighton Wheel operated successfully on Madeira Drive between 2011 and 2016, becoming a recognised seafront landmark and popular visitor attraction. The wheel was always intended as a temporary meanwhile use and, following the expiry of its lease, was removed to facilitate the development of the i360.

3.2 At the time, the council took the view that supporting the launch of the new multi-million-pound i360 attraction was important to help it establish itself as a flagship visitor destination for Brighton & Hove. The wheel's removal, around 10 years ago, reflected the council's commitment to enabling the i360 to develop and strengthen the city's tourism offer.

3.3 Since then, the i360 has become an established part of Brighton's visitor economy and demand for elevated seafront experiences has remained strong. The council's view is that the return of an observation wheel would complement existing attractions by providing a different visitor experience, appealing to different markets and further enhancing the seafront's appeal as a destination for residents and visitors alike.

3.4 The proposal supports the objectives of the Seafront Development Board and the Seafront Prospectus, both of which seek to encourage investment, improve the visitor experience and enhance the economic performance of the seafront. The return of a highly visible attraction would provide an early and tangible demonstration of progress within the wider regeneration programme for the Eastern Seafront.

3.5 The proposed operator is a local family-run business with more than 15 years' trading experience at the site and has invested in excess of £1.33 million in infrastructure and attractions along Madeira Drive, including the Zip Wire and structural works associated with the previous Wheel installation.

3.6 Under the proposed arrangement, all operational, maintenance, staffing and commercial responsibilities would remain with the tenant. The council's role would be limited to that of landlord and would not be dependent upon visitor numbers, turnover or business performance. This arrangement provides a guaranteed rental income while transferring all commercial risk to the operator.

3.7 The Wheel is expected to increase visitor footfall and encourage movement towards the eastern section of the seafront, supporting nearby businesses and complementing existing attractions including the Sea Life Centre, Volk's Railway, adventure golf, the Zip Wire and Brighton Palace Pier.

3.8 The Brighton Wheel proposal supports the Council Plan priorities by strengthening the visitor economy, creating jobs, increasing footfall for local businesses and attracting investment to the seafront. As a distinctive attraction, it would help grow a diverse and sustainable local economy while enhancing the city’s unique identity. The proposal also aligns with the city’s Economic Plan by supporting sustainable economic growth, extending the

tourism season and reinforcing Brighton & Hove's position as a leading visitor destination.

3.9 As the land proposed for the Brighton Wheel is designated as public open space and the proposed lease term exceeds seven years, the council will be required to undertake the statutory public open space consultation process before any final decision is made. The consultation will provide an opportunity for interested parties, including residents, stakeholders and other users of the space, to comment on the proposal. All representations received during the consultation period will be carefully considered and taken into account as part of the decision-making process. Following completion of the consultation and consideration of any responses, the final decision on whether to proceed with the lease will be made by the Director under delegated authority, having regard to the consultation outcomes and all other relevant Planning and legal considerations.

4. Analysis and consideration of alternative options

4.1 The proposed return of the Brighton Wheel must be considered within the context of a number of significant site-specific constraints that limit the range of realistic alternatives. A comprehensive review of the seafront has confirmed that this is the most suitable location for accommodating a wheel of this scale.

4.2 A key consideration is that the building beneath the site was specifically strengthened in 2011 to accommodate the original Brighton Wheel. These structural works were undertaken at significant expense by the current tenant and the support infrastructure required for the Wheel now forms an integral part of the building. The building itself is subject to a secure tenancy, meaning that the council is unable to separate the site from the underlying asset for the purposes of marketing it independently. As a result, an open market exercise seeking alternative operators is not considered a viable option, as any prospective operator would remain dependent on infrastructure embedded within a privately occupied premises.

4.3 The potential impact of the Wheel on the city's wider visitor economy has been carefully considered. The introduction of a major new seafront attraction is expected to strengthen Brighton & Hove's tourism offer by increasing the city's appeal as a visitor destination, attracting additional visitors and encouraging longer stays. The council considers that the Wheel would complement the existing range of tourism and leisure attractions by providing a distinct visitor experience and broadening the overall offer available to residents and visitors. Experience from other established seaside destinations demonstrates that a diverse mix of attractions can operate successfully alongside one another and collectively enhance the visitor economy. The proposal is therefore expected to increase overall footfall and deliver wider benefits for attractions, businesses and the local economy across the city.

4.4 Another alternative would be not to proceed with the proposal and leave the site vacant. While this would avoid potential Planning objections and

stakeholder concerns, it would also result in the loss of a significant opportunity to enhance the city's visitor offer and generate income from an otherwise constrained site. As with many seafront developments, some objections are anticipated, particularly from a small number of nearby residents. However, experience suggests that such representations typically come from a limited but vocal minority and do not necessarily reflect wider public opinion.

4.5 The return of the Brighton Wheel would create a highly visible landmark attraction, increase footfall and help draw visitors eastwards towards quieter parts of the seafront. This, in turn, would support surrounding hospitality and leisure businesses and complement existing attractions including the Sea Life Centre, Volk's Electric Railway, the Zip Wire, adventure golf and Brighton Palace Pier. As a family friendly, year-round attraction with a proven track record, the Wheel would strengthen the overall visitor experience, contribute to a more balanced distribution of activity along the seafront and support the council's wider objectives for a vibrant and economically successful seafront destination.

5. Community engagement and consultation

5.1 This is a commercial arrangement and lead Councillors have been briefed on the terms of this lease.

6. Financial implications

6.1 As part of the 2026/27 budget setting process and agreed at Budget Council, the MTFS contains income targets for commercialisation of existing council assets. Agreement of this 25 year lease will contribute towards these income targets. Should a lease not be agreed, then these income targets may not be fully achieved adding further pressure to the councils financial position Under the proposal all operational associated costs would be the responsibility of the tenant with the councils role limited to landlord which would provide a guaranteed rental income while transferring all commercial risk to the operator.

Name of finance officer consulted: John Lack Date consulted: 18/08/2026

7. Legal implications

7.1 The Council has the power to dispose of the land by way of a 25 year long lease under section 123 of the Local Government Act 1972 ("LGA 72") subject to obtaining the best consideration reasonably obtainable. Where a site is open space, under section 122 (2A) of the LGA 1972, this power is also subject to a requirement to advertise the proposed disposal in a local paper for two consecutive weeks and to consider any objections raised before taking a decision on whether to dispose of the land. In exercising the delegations set out in this report, the Director City Operations in consultation with the Director Property & Finance and Cabinet Member for Economy, Culture, Heritage and Tourism. will need to be satisfied that these requirements are met.

7.2 Prior to grant of the lease of the land it will also be necessary for Legal Services to review the titles to the properties to confirm that no interests exist that may prevent a transfer. If any restrictions or covenants exist, the reviews will ascertain whether or not they are still capable of being enforced.

Name of lawyer consulted: Hannah Bassett Date consulted:(03/09/2026)

8. Risk implications

8.1 Under the proposed arrangement all financial and commercial risk is passed to the tenant. The council's role would be limited to that of landlord and rental income would not be dependent upon visitor numbers, turnover or business performance.

9. Equalities implications

9.1 The Brighton Wheel proposal has been considered with regard to its equality and inclusion implications and is expected to provide a positive and accessible visitor attraction for a wide range of users. The Wheel will be fully wheelchair accessible, enabling people with mobility impairments to access and enjoy the attraction alongside other visitors. The operator will be required to comply with the Equality Act 2010 and all other relevant legislation, regulations and industry standards relating to accessibility, health and safety, and customer service. The design and operation of the attraction will seek to minimise barriers to participation, with accessible boarding arrangements, clear signage, staff training and reasonable adjustments provided where required. The area immediately in front of the site will remain clear and unobstructed to maintain safe and convenient pedestrian movement for all users, including wheelchair users, people with pushchairs and those with visual or mobility impairments. An inclusive pricing structure will be expected, with consideration given to concessions and companion or carer arrangements where appropriate, helping to ensure that the attraction is accessible to people from a range of socio-economic backgrounds. Overall, the proposal is intended to support equal access and enjoyment for residents and visitors regardless of age, disability, gender, race, religion or belief, sexual orientation, pregnancy and maternity status, or other protected characteristics.

10. Sustainability implications

10.1 Sustainability will be addressed through the Planning process.

11. Social Value and procurement implications

11.1 This is a lease arrangement and there are no direct procurement implications.

12. Crime & disorder implications

12.1 The observation wheel will generate increased activity and footfall throughout the year, extending into the evening period. The attraction will be

illuminated and will provide a prominent, well-used focal point within the area, increasing natural surveillance and contributing to a safer environment for visitors and residents during hours of darkness.

13. Public health implications

13.1 A vibrant and active seafront supports health and wellbeing by encouraging people to spend time outdoors, engage in walking and recreation and enjoy opportunities for social interaction in an attractive coastal environment.

14. Conclusion

14.1 The proposed reinstatement of the Brighton Wheel represents a significant opportunity to secure a major investment in the city's seafront at no capital cost and with no operational or commercial risk to the Council. The proposal would deliver a substantial increase in rental income, support the Council's commercial objectives and contribute positively to the Medium Term Financial Plan through a guaranteed rental stream.

14.2 The Wheel has a proven track record as a popular visitor attraction and would strengthen Brighton & Hove's tourism offer by complementing existing attractions and encouraging increased footfall, particularly towards the eastern seafront. Its return would support local businesses, enhance the visitor experience and provide a visible demonstration of progress in delivering the ambitions set out within the Seafront Prospectus and wider regeneration programme.

14.3 Cabinet is therefore recommended to approve the grant of a 25-year lease and delegate authority to the Corporate Director Property & Finance to conclude the necessary legal agreements to enable the project to proceed.

Supporting Documentation

1. Appendices

1. Site Plan



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Brighton Zip

Scale: 1:1,750 @A4

Brighton & Hove City Council

Brighton & Hove City Council

Cabinet

Agenda Item 57

Subject: **Update Report on Western Road Resurfacing Works and Red Route**

Date of meeting: **Thursday, 17 September 2026**

Report of: **Corporate Director Operations**

Lead Officer: **Name: Corporate Director- Operations**

Contact Officer: **Name: Charles Field**

Email: charles.field@brighton-hove.gov.uk

Wards affected: Brunswick & Adelaide; Regency;

Key Decision: Yes

Reason(s) Key: Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

1.1 On 20 March 2025 Cabinet approved the design and implementation of a Red Route in Western Road between Holland Road and Montpelier Road. This report seeks permission to proceed with the Experimental Traffic Regulation Order (ETRO) for Western Road and requests that Cabinet notes the need for resurfacing programme for this section of Western Road. This is aligned with the Council Plan objective to 'Make it easier for people to move around the city'

1.2 The Council has subsequently received a Pre-Action Protocol letter and responded, both letters are included in Part 2 of the report. This report provides Cabinet with more detailed information about the primary aim of the scheme, to reduce congestion and improve bus reliability along this key transport corridor. Cabinet is also asked to note the considerations made with reference to the issues highlighted in the Pre-Action Protocol letter and is seeking a fresh new decision from Cabinet in light of this additional information.

2. Recommendations

2.1 Cabinet notes the issues raised in the Pre-Action Protocol (PAP) correspondence, the updated Equality Impact Assessment, and the nature and scope of the proposed monitoring in relation to the primary aim of the scheme. The primary aim or purpose of the scheme is to reduce congestion

in the area to allow for improved bus reliability during the experimental period.

2.2 Cabinet agrees to the implementation of the Experimental Traffic Regulation Order for Western Road between Holland Road and Montpelier Road should proceed, having reviewed this additional information.

2.3 Cabinet notes the resurfacing programme for this section of Western Road.

3. Context and background information

Resurfacing Works

3.1 The council is progressing a major carriageway reconstruction and resurfacing scheme on Western Road between Holland Road and Montpelier Road. The scheme is required due to the condition of the existing carriageway and will involve substantially more work than a conventional resurfacing project, including excavation and reconstruction of the underlying road structure together with associated drainage and highway works.

3.2 The route is one of the city's busiest transport corridors, carrying significant volumes of traffic, public transport, deliveries and pedestrian activity. The works will result in a much more durable surface and reduce the need for future repairs.

3.3 Ground investigations and trial holes are being undertaken to confirm the existing road construction and inform the final engineering design. Subject to the completion of the necessary approvals and permits, construction is currently programmed to commence on 28 September 2026 and is expected to take approximately 45 days.

3.4 Delivering the scheme before the winter period will help prevent further deterioration of the carriageway and reduce the need for reactive maintenance.

3.5 Due to the scale of the reconstruction, significant traffic management arrangements will be required during construction. Detailed planning is underway with key stakeholders, including public transport operators, to minimise disruption and maintain access wherever possible.

Red Routes

3.6 In April 2024 Red Routes were introduced in London Road, Preston Road and Lewes Road primarily to improve bus services and tackle anti-social parking along key routes into and out of the city.

3.7 Monitoring of those routes has noted improvements in bus reliability as a result of reduced congestion and reductions in bus passenger injuries and reductions in road traffic collisions.

3.8 Bus journey times and network reliability can be adversely affected by vehicles stopping on double yellow lines and by loading activity occurring in unsuitable locations.

3.9 On 20 March 2025 Cabinet approved the design and implementation of a Red Route in Western Road between Holland Road and Montpelier Road.

3.10 On 26 May 2026 the Cabinet Member for Transport & City Infrastructure approved the implementation of an Experimental Traffic Regulation Order (ETRO) for the scheme, following completion of the detailed design process and public engagement.

3.11 The proposed Red Route introduces dedicated loading bays, disabled parking provision and camera-enforced double red line restrictions intended to improve the movement of traffic while maintaining access to businesses and services. Camera enforcement is not an automated process and PCNs are not issued automatically. Trained Enforcement Officers actively monitor restrictions, review any potential contraventions and capture evidence. Before a PCN is issued, the recorded evidence is reviewed and verified by a second authorised officer to ensure the contravention has been correctly identified and that sufficient evidence exists to support enforcement action. Western Road is one of the busiest transport corridors in the city and accommodates a high frequency of bus services alongside significant retail, hospitality, servicing and pedestrian activity.

3.12 The ETRO process enables the Council to monitor impacts in real-world conditions and make amendments where appropriate before any decision is made regarding the introduction of a permanent Traffic Regulation Order.

3.13 Following publication of that decision, the Council received Pre-Action Protocol (PAP) correspondence included in Part 2 of this report from representatives of the Western Road Community Group challenging the proposed implementation of the ETRO, A summary of the issues raised can be found in appendix 5

3.14 The Council instructed external Counsel and issued a formal response to the matters raised in that correspondence.

3.15 This report updates Cabinet on the issues raised through the PAP process, provides an update on equalities and implementation arrangements and seeks approval to proceed with the Experimental Traffic Regulation Order.

Statutory Purposes

3.16 The proposed measures will be implemented through an Experimental Traffic Regulation Order (ETRO), which allows the scheme to operate for up to 18 months, with a statutory six-month period following implementation during which formal objections and representations can be submitted and considered before any decision is taken on whether the measures should be made permanent. The ETRO is made under section 9 Road Traffic

Regulations Act for purposes under s1 Road Traffic Regulations Act 1984 only. Specifically, to reduce congestion created by long term parking issues and thereby improve bus journey times through this critical bus corridor through which up to 700 buses per day travel in both directions). Evidence of the congestion is demonstrated by the number of calls received by our enforcement contractor (almost one per week) complaining about large numbers of vehicles parked on double yellow lines in this short stretch of road and requesting that immediate enforcement action be taken. This is despite one of the highest rates of on foot enforcement visits in the city with a total of 705 visits from April 2026 to the beginning of August 2026.

3.17 As explained in 6.2 of this report the cost to the authority of addressing this long running congestion issue and thereby improving bus reliability includes the provision of additional staff and associated costs which largely outweighs any potential incidental income in the longer term. The objective is to improve compliance with the restrictions and improve traffic flow. Experience with previous red routes and other enforcement schemes has followed a similar pattern.

3.18 The budgeted provisional assessment of additional net income that would be raised is £50k from the introduction of this scheme. This should be viewed in the context of the overall council parking surplus from permits, enforcement, on street parking etc. of £22.5m in 2024-25 (see published parking annual report). The PAP Letter has (incorrectly) argued that a dominant purpose of the proposed scheme is to raise revenue. For the reasons set out in this report that is not correct, but the historical matters that letter relies upon to support a suggestion that now the dominant purpose remains revenue raising are dealt with further in appendix 6. The proposals include an approach that when enforcement commences a minimum of a two-week period of warning letters followed by a two-week period of non-enforcement will alert any habitual illegal parking

Section 122 Road Traffic Regulation Act 1984 Balancing Duty

3.19 In exercising its powers under the Road Traffic Regulation Act 1984, the Council must, pursuant to section 122, secure the expeditious, convenient and safe movement of vehicular and other traffic, including pedestrians, whilst having regard to factors including access to premises, local amenities, the effect on the wider road network and environmental considerations. Officers have reviewed the Western Road Experimental Traffic Regulation Order (ETRO) proposal against those statutory requirements. The general need to and benefits of enhancing bus provision through faster, more reliable, and safer services is well established in national guidance running from Bus Back Better in 2021 to current 2026 guidance, as well as through the BSIP adopted by the Council in 2021 and the 2025 refresh. It should be noted that Brighton & Hove is recognised as having one of the highest per person levels of bus use in England, outside London.

Road Safety Evidence

3.20 The Council acknowledges that Western Road has different characteristics to those corridors where Red Routes have previously been introduced in the city and that collision data does not identify incidents specifically attributable to vehicles loading or stopping at the kerbside. However, the objectives of the proposed ETRO are not limited solely to collision reduction. The scheme is intended to improve bus reliability, reduce congestion, improve traffic flow and address obstructive stopping activity on a corridor that accommodates high levels of bus movements, servicing activity, pedestrian activity and general traffic.

Whilst the Council has considered evidence from existing Red Routes elsewhere in the city, officers do not rely on those outcomes as direct predictors of the impacts on Western Road. Rather, they provide evidence that Red Route interventions are capable of delivering transport and road safety benefits in heavily trafficked urban corridors. The purpose of the ETRO is to establish whether those benefits can be achieved in the specific circumstances of Western Road and to gather corridor-specific evidence before any decision is taken regarding a permanent order. Given the significant reduction in collision data in previous red route schemes it does appear reasonable to assume that reducing congestion through providing dedicated bays could have a positive effect in Western Road.

Ability of the Scheme to Achieve its Objectives

3.21 The Council acknowledge that the proposed scheme does not prohibit all stopping activity along Western Road. The scheme includes bus stops, loading bays and disabled bays in order to maintain access to businesses, services and public transport.

The purpose of the scheme is therefore not to eliminate all stopping activity or all potential hazards. Rather, it is intended to manage kerbside activity within designated locations and reduce instances of obstructive or inappropriate stopping that contribute to congestion and delay. Reducing unregulated stopping activity whilst maintaining controlled provision for essential uses is consistent with the Council's duties under section 122 and represents a proportionate approach to balancing competing demands on limited highway space.

Footfall Evidence

3.22 It is recognised that changes in footfall are influenced by a wide range of factors including economic conditions, seasonal variation, development activity, weather and wider changes in travel behaviour. It is therefore not possible to attribute any change in footfall solely to the introduction of a Red Route.

For this reason, there is no reliance on claims that a Red Route will necessarily increase footfall on Western Road. Rather, evidence from other corridors indicates that slightly increased footfall has occurred following implementation of Red Routes, although the precise contribution made by

the schemes cannot be isolated. Footfall impacts remain uncertain and will require monitoring as part of the experimental period.

Air Quality Evidence

3.23 It is recognised that air quality outcomes are similarly affected by a range of factors, including traffic composition, vehicle technology, wider transport trends and background environmental conditions, as well as a potential reduction in engine idling.

Red Routes alone are not necessarily responsible for changes in air quality observed elsewhere in the city. However, reducing unnecessary congestion and improving traffic flow are generally recognised as factors capable of contributing to improved air quality. The evidence available from existing corridors provides some indication of potential benefits, but the specific effects on Western Road cannot be determined in advance and should therefore be assessed through the monitoring arrangements associated with the ETRO.

Economic Impacts

3.24 The importance of Western Road as a significant retail, leisure and commercial destination is acknowledged and concerns regarding potential impacts on independent businesses, servicing activity and customer access are noted.

The scheme has been developed with regard to these considerations through engagement with businesses, site assessments and review of loading requirements. It is recognised that Western Road contains a concentration of businesses that rely on front-of-premises servicing and that the corridor differs from some other locations due to limited rear servicing opportunities. The provision of new loading bays supports continued accesses to businesses for servicing.

These factors are of significance within the section 122 balancing exercise. However, they are balanced against the objectives of improving bus reliability, reducing congestion and improving traffic flow along one of the city's busiest transport corridors in line with the Council Plan objective of ‘Making it easier for people to move across the city’. The ETRO process has been selected specifically because it enables economic impacts to be monitored in operation and allows adjustments to be made if evidence demonstrates that modifications are required. As with previous red routes footfall will be monitored during this experimental period.

Traffic Displacement and Conservation Areas

3.25 Concerns regarding the potential displacement of parking and servicing activity into adjacent residential streets, including streets within or adjoining the Brunswick Town Conservation Area and around Brunswick Square are recognised.

Potential displacement effects have been considered during development of the proposal. Some degree of behavioural change may occur following implementation, but the scale and significance of any displacement cannot be reliably determined in advance. Accordingly, monitoring of adjacent streets will form part of the assessment of the ETRO. In addition to this and to mitigate, increased Civil Enforcement Officer presence in those streets will take place during the experimental scheme and on an ongoing basis to dissuade any displacement effects.

Loading Bay Provision

3.26 The adequacy of loading provision has been a key consideration in the design of the scheme. The location and size of proposed loading bays has been informed by site visits with Road Safety officers, stakeholder engagement and consultation feedback. The maximum distance between the proposed loading bays and a business is approximately 70 metres. Although it should be noted that the ability to deliver is currently sometimes hampered by inappropriate parking.

Concerns regarding loading provision in the western section of the corridor are noted and that loading requirements vary between businesses throughout the day. For this reason, information about the frequency and size of vehicle deliveries was gathered as part of the Your Voice consultation. Loading bay occupancy and utilisation will form a specific part of the monitoring programme during the experimental period.

The ETRO process provides flexibility to amend the location, size or operation of loading bays where monitoring evidence demonstrates that changes are required. It is considered that the proposed loading arrangements provide an appropriate starting position for an experimental scheme whilst retaining sufficient flexibility to respond to operational experience.

Overall Section 122 Assessment

3.27 The uncertainties and concerns identified in relation to safety evidence, economic effects, displacement, loading provision, air quality and footfall are noted. Having considered the matters above it is considered that the factors identified in section 122 of the Road Traffic Regulation Act 1984 have been appropriately balanced against the potential benefits and the requirements of Section 122 satisfied. Based on previous red route schemes, the council reasonably expects reduced congestion, improved bus reliability and associated benefits.

The nature of these uncertainties identified in this report support the use of an Experimental Traffic Regulation Order rather than weigh against it, as the ETRO process allows the Council to gather Western Road-specific evidence, monitor impacts, engage with stakeholders and make modifications where necessary before determining whether any arrangements should become permanent.

4. Analysis and consideration of alternative options

4.1 The option of not proceeding with the Experimental Traffic Regulation order in Western Road was considered. However, based on the areas where red routes have been introduced there are significant potential benefits to relieving congestion in the Western Road area, such as improved road safety and bus journey times.

4.2 The option of implementing a permanent Traffic Regulation Order from the outset was considered. The learning from the introduction of Red Routes in Lewes Road and London Road using Experimental Traffic Regulation Orders has shown that engagement with businesses and disabled groups is necessary after the Red Route has been implemented and this can require rapid adjustments to the initial design of the scheme, which are much more easily facilitated through the Experimental Traffic Regulation Order process.

5. Community engagement and consultation

5.1 Consultation on the design of the scheme was held at LAT meetings and the Cabinet Member for Transport & City Infrastructure. Meetings were also held on the scheme design with the Disabled Car User Advisory Group.

5.2 Over 4,700 leaflets were sent to residents in the area inviting them to comment on the proposed red route between 24 November 2025 – 4 January 2026. 1,032 responses were received and a summary of their feedback can be found in appendix 1

5.3 Fifty per cent of respondents said they believed the red route would improve safety, 53 per cent said it would speed up bus journeys and 56 per cent felt it would help keep traffic moving. People with disabilities and Blue Badge holders were concerned about access. More disabled bays will be introduced on both Western Road and its side streets. We will be monitoring the use of these bays continuing to engage with disabled groups. Businesses asked for more loading bays and some raised concerns that business could be negatively affected by the red route with a decline in footfall.

6. Financial implications

6.1 As with any introduction of new enforcement schemes across the city there is likely to be a short-term spike in the Penalty Charge Notice income, however this would be a short-term impact only and cannot be quantified. Any additional income received will be reported to Cabinet through the revenue TBM reports.

6.2 As noted above, the primary aim of the Western Road scheme is to reduce congestion, not revenue generation. Although a short-term increase in income is expected this is largely offset by the cost of cameras and enforcement staff. Experience of the introduction of previous red routes

indicates that compliance with the new restrictions improves quickly resulting in a fall in Penalty Charge Notices issued after the initial peak. Therefore, overall impact of this scheme on parking budgets has been budgeted at £50k annually as part of the savings exercise for 26/27

6.3 The tendered value of Western Road resurfacing works is £988,431 and will be covered by the Highways maintenance Block funding awarded by the Department for Transport (DfT). This has no budgetary impact on the council as a result

Name of finance officer consulted: David Wilder Date consulted 26/8/2026:

7. Legal implications

7.1 The Council has powers under sections 9 and 10 of the Road Traffic Regulation Act 1984 ("RTRA 1984") to make an Experimental Traffic Regulation Order ("ETRO") for the purposes of carrying out an experimental scheme of traffic control, to test proposed traffic management measures. The proposed ETRO would introduce Red Route restrictions along Western Road on an experimental basis, which will enable the Council to assess the effectiveness of the measures in reducing congestion and thereby improve bus journey times.

7.2 In exercising its powers, the Council must have regard to its duties under section 122 of the RTRA and the report sets out in detail these considerations and comes to an overall assessment and conclusion that the ETRO is justified. The Council must also have regard to its network management duty under section 16 of the Traffic Management Act 2004 to secure the expeditious movement of traffic on its road network and facilitate the movement of traffic on other authorities' networks; the proposed ETRO seeks to secure the expeditious movement of traffic along this section of its road network. The Council must have regard to equality considerations under section 149 of the Equality Act 2010 (the Public Sector Equality Duty); section 9 of the report sets out how the Council has paid due regard to these considerations.

7.3 The Council must ensure that the statutory consultation and notification requirements are fully complied with and that all representations received are properly considered as part of any subsequent decision-making process.

Name of lawyer consulted: Katie Kam Date consulted (19 08 2026):

8. Risk implications

8.1 There is a risk that businesses along the route area could be less able to receive their deliveries. Although the area is already suffering from significant congestion which can hamper deliveries. Ten loading bays have been included in the scheme design, with a total of 140 meters of loading space to meet these needs based on the required size of delivery vehicle.

The Experimental Traffic Regulation Order process together with engagement with businesses allows for rapid changes to the size and location of loading bays.

8.2 There is a risk that parking activity can be displaced to side streets. To mitigate this Civil Enforcement Officers will be deployed to patrol side streets along the red route area.

9. Equalities implications

9.1 Officers held three meetings with the Disabled Car User Advisory Group specifically on the red route proposals. The group highlighted that the introduction of a red route could negatively impact disabled people's access to Western Road, including attending healthcare and other appointments, undertaking everyday shopping/leisure, receiving deliveries.

9.2 These meetings have helped informed the location of disabled bays along the red route and their location close to health facilities as well as an even distribution along the area (see appendix 3). On Western Road a 3-hour maximum stay in disabled bays to prevent long term parking and improve access to these bays is proposed. As with Lewes and London Road red routes drivers and taxis will be able to drop off disabled passengers along the red route. In Upper Market Street a new disabled bay is being introduced close to the WellBN Brunswick clinic. In addition to this a further 4 disabled bays are being proposed along Western Road.

9.3 An EIA has been prepared which considers the feedback from the Disabled Car User Advisory Group meetings and the feedback from the Your Voice consultation. The aim of the red route is to relieve congestion and improve bus journey times including for disabled bus passengers.

9.4 The main positives identified in the EIA are:

- Ease of traffic flow and designated bays allows for safer roads with clearer sight lines for traffic
- 7,000 disabled people in the city have free bus passes and rely on buses to travel safely and easily around the city, and bus reliability is expected to improve.
- Red routes, loading and disabled bays provide for enough time for carers to pick up and drop off disabled clients • Improved traffic flow benefits emergency vehicle access
- Clearer road layout improves safety for people with visual impairment

9.5 The main negatives identified in the EIA are:

- People with sight impairments can be affected by difficulties navigating and seeing changes to signage, barriers, and judging distances from other people.

- New restrictions being introduced can be anxiety-inducing for some people with mental health issues or neurodivergence due to uncertainty around the changes and rules.
- Changes to restrictions could limit access by Blue Badge holders with severe mobility issues to some locations within the scheme area.
- May impact those requiring door-to-door transport services
- Could affect those who need frequent rest stops due to mobility issues

9.6 Mitigations to address these negative impacts are being put in place as set out at paragraph 9.2. Overall, it is recognised that Blue Badge holders can currently experience difficulties accessing shops in the area due to the number of bus stops, pedestrian crossings and the volume of vehicles parked on yellow lines under the current restrictions. The proposed change in the restrictions will provide new disabled bays solely for the use of Blue Badge holders to access the area although it is acknowledged that they will not always be sufficiently close to shops or may be occupied. The scheme should however benefit disabled bus passengers through more reliable bus services in this busy transport corridor and throughout the city.

In conclusion, it is acknowledged that the proposed scheme may have some negative impacts for certain groups, but has sought to minimise these through engagement, design changes, mitigation measures and ongoing monitoring. Having balanced these impacts against the anticipated benefits of improved bus reliability, traffic flow, road safety and accessibility for public transport users amongst others, the Council considers that the overall impact is positive and that any remaining adverse impacts are justified and proportionate in the context of the wider public benefits the scheme is intended to deliver.

10. Sustainability implications

10.1 Experience from the Lewes and London Road red routes shows that they can reduce congestion along the route and make the area more attractive for cyclists and other forms of active travel. Improvements to bus reliability have also been observed, which encourages more sustainable forms of travel with the aim of improving air quality in the area.

11. Health and Wellbeing Implications:

11.1 The purpose of the red route is to relieve congestion and make the area safer for drivers, bus passengers and cyclists, which can also encourage active travel. Air quality improvements have been observed in areas where other red routes have been introduced.

12. Conclusion

12.1 Following the March 2025 Cabinet decision to approve the design and implementation of a red route in Western Road officers have now completed the design of the scheme based on feedback from pre-engagement and the Your Voice survey. As part of the Experimental Traffic Regulation Order

process amendments to the design shown in appendix 4 can be made promptly as part of further public engagement.

12.2 Experience following the introduction of red routes in other areas of the city has shown there can be benefits in terms of road safety and bus reliability without negatively affecting footfall in the area.

Supporting Documentation

1. Appendices

1. Consultation and Engagement Summary
2. Equality Impact Assessment
3. Disabled bay location plan
4. Western Road ETRO Plan
5. Summary of Pre-Action Protocol letter and response
6. Chronology

2. Background documents

1. Cabinet Report: Red Routes, 20 March 2025.
2. Cabinet Member Decision Report: Permission to Proceed with Experimental Traffic Regulation Order for Western Road Red Route, 26 May 2026.
3. Bus Service Improvement Plan programme documentation.
4. Council Plan 2023-2027
5. City Transport Plan 2035
6. Local Cycling and Walking Infrastructure Plan

Western Road Red Route - Your Voice consultation report 2026

Background

A Red Route is proposed for implementation on Western Road, from Holland Road to Montpelier Road. This is proposed under an Experimental Traffic Regulation Order (ETRO) following the same process as the Red Route's on London/Preston Road and Lewes Road. This consultation is to gather feedback on the proposals and initial design.

Methodology

Brighton & Hove City Council sent an information leaflet to addresses directly on Western Road and the surrounding area of the proposed changes. This leaflet included a detailed map of the proposed changes, and frequently asked questions. People were asked to go online to complete the consultation survey. This was also promoted on the Council website, Facebook, X & LinkedIn. People could also request a paper copy of the questionnaire with a pre-paid envelope to return. The consultation ran from 24 November 2025 – 4 January 2026.

Results

A total of 1,032 responses were received.

Questions asked and answers are as follows:

- How are you responding to the consultation?

Respondent type	Amount
A business owner or manager	32
A local resident	937
A stakeholder or on behalf of an organisation	11
A visitor	52

- **What do you mainly use the area for?**
  This was a multiple choice question

Activity	Amount
To visit friends and family	281
To visit a place of worship	29
To sit in the gardens	128
To get from A to B	675
I work here	141
For leisure	581
To shop	704
Other	110

'Other' was a free form box, common answers are below:

- I live here / in the area
- To visit essential services (GP, chemist, dentist, opticians, hearing clinic, laundrette)
- Commuting and travelling through
- Dropping off friend/family
- School run

- **How many deliveries do you receive per day?**
  This was answered by 29 business owners or managers, 2 local residents and 1 as a stakeholder or on behalf of an Organisation.

Delivery frequency	Amount
A few times per week	12
Once per day	2
More than once per day	18

- **What size is the delivery vehicle?**
  Multiple choice question

Vehicle type	Amount
Transit Van	21
Luton Van	12
7.5 Lorry	10
HGV	8
Articulated lorry	6
Car	8
Don't know/not sure	2

- **Do you think the proposal will improve safety for:**

Road user type	Yes amount	Yes %	No amount	No %	Not sure amount	Not sure %
Pedestrians	543	52.6%	412	39.9%	34	3.3%
Cyclists	560	54.3%	367	35.6%	45	4.4%
Disabled people	487	47.2%	400	38.8%	72	7.0%
Drivers	462	44.8%	413	40.0%	73	7.1%
Bus Users	524	50.8%	383	37.1%	144	14.0%

- **Do you think the proposals will?**

Improvement statement	Yes amount	Yes %	No amount	No %	Not sure amount	Not sure %
Improve bus journey times	542	52.5%	375	36.3%	65	18.7%
Keep the traffic moving	581	56.3%	358	34.7%	135	4.4%
Improve loading capacity for deliveries	324	31.4%	476	46.1%	156	15.1%

Common themes

Respondents were then asked if they had any further comments on the proposals, there was a free form text box to give further feedback. These have been grouped by common themes and are detailed below. 792 respondents left further comments, 76.7%.

Comment Themes	Amount
Will adversely affect businesses	201
Road or pavement currently feels dangerous with illegal parking & high congestion	102
Proposals will increase displacement to side roads / have an effect on resident parking bays	58
Where do businesses /loading park/ not enough loading bays	52
Enforce existing rules instead	50
Hope this improves cycling safety / general road safety	50
Adverse effect on blue badge holders / person with a disability / vulnerable people	41
Looks great / should have happened years ago	38
Where do customers park? Needs short term customer parking	38
Needs more parking / more parking should be in side roads	36
Stop pavement parking	23
Ensure its correctly enforced	19
Hopes this will improve bus journey times / Bus currently takes too long	19
Extend the Red Route	15
Poor road condition / Needs resurfacing	14
Irrelevant comments	13
Hope this improves air quality / poor air quality currently	12
Concern on speeding / 20mph needs to be enforced	12
Needs light controlled crossings /bottom Brunswick place	11
Time of day flexibility for bay use /24 hour route not needed	11
Special needs for this business	10
Use DYL's instead of single/ DYL's instead of red route	8
Would like a cycle lane	7
Traffic would move faster and feel more dangerous / cause more congestion / more air pollution	7

Observed criminal and illegal activity	5
Concern on amount of loading bays (too many)	4
Consultation trust / disappointed in questions	4
CCTV concern / privacy	4
Project team to be aware of comment	4
Where do visitor's park	3
Stronger fines needed	3
Infrastructure comment (bollards, pavements)	3
Too much residents parking	2
Include a bus lane / bring back bus stop	2
Alternative parking solutions	2
Only useful Montpelier to Norfolk Square	1

Equalities and demographic questions & information

Do you want to answer the following equalities monitoring questions?	Amount
Yes	567
No	465

What is your age	Amount
18-24	14
25-34	76
35-44	94
45-54	137
55-64	137
65-74	81
75-85	21
85+	1
Prefer not to say	3

Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?	Amount
Yes, a lot	45
Yes, a little	78
No	425
Prefer not to say	18

Are you a carer?	Amount
Yes	46
No	506
Prefer not to say	13

Is the gender you identify with the same as your sex registered at birth?	Amount
Yes	535
No	7
Prefer not to say	19

How would you describe your ethnic origin?	Amount
Asian / Asian British: Chinese	1
Asian / Asian British: Indian	3
Asian / Asian British: Other	5
Black / Black British: African	3
Black / Black British: Caribbean	3
Mixed: Any other mixed / multiple ethnic background	5
Mixed: Asian and White	7
Mixed: Black African and White	1
Mixed: Black Caribbean and White	3
Other ethnic group, please describe	1
Other Ethnic Group: Arab	4
White: English, Welsh, Scottish, Northern Irish, British	434
White: Gypsy or Irish Traveller	1
White: Gypsy or Irish Traveller	9
White: Other	57
Prefer not to say	22

What is your religion or belief?	Amount
Agnostic	16
Atheist	56
Buddhist	8
Christian	96
Hindu	1
Jain	1
Jewish	4
Muslim	4
Pagan	2
Other philosophical belief	10
Other religion or belief, please describe	16
Prefer not to say	24

General Equality Impact Assessment (EIA) Form

Support:

An EIA toolkit, workshop content, and guidance for completing an Equality Impact Assessment (EIA) form are available on the EIA page of the EDI Internal Hub. Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact the Equality, Diversity, and Inclusion (EDI) team by emailing Equalities@Brighton-Hove.gov.uk. If your request is urgent, please mention this in the subject line of your email so we can support as required.

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Business Partner. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to the Equalities team by emailing the Equalities inbox and copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), any other relevant service colleagues to enable EIA communication, tracking and saving.
- Your EIA will be reviewed, discussed, and then approved by the assigned EDI Business Partner and after seeking additional approval as appropriate for your EIA.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the EIA toolkit for more information.

Name of activity or proposal being assessed:	Red Route – Western Road
Directorate:	City Services
Service:	Parking Services
Team:	Parking Projects
Is this a new or existing activity?	New
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes – EEC51 Red Routes Experimental

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Flora McLeod, Senior Parking Projects Officer
Accountable Manager:	Peter Turner, Senior Parking Projects Manager
Additional stakeholders collaborating or contributing to this assessment:	James Ingle, Parking Projects Support Officer

3. About the activity

Briefly describe the purpose of the activity being assessed:

After the public consultation and successful implementation of the Experimental Traffic Regulation Order (ETRO) Red Routes on Lewes Road and London Road, the Parking Projects team received a number of emails supporting the scheme and asking for further red routes within the city. This equality impact assessment will grow as the project progresses and following our public consultation.

The focus of this EIA is to ensure that all impacts relating to the listed below groups are identified and considered within the scope of the project, funding availability and realistic ability to mitigate. This will include accessibility to loading and parking provisions, how to reduce concerns with exemption information and unfair penalisation.

What are the desired outcomes of the activity?

Objective 1: To reduce congestion and make travel easier and safer for all road users. A Red Route on Western Road is anticipated to reduce congestion through CCTV monitoring and issuing Penalty Charge Notices (PCNs) to nuisance loading and stopped vehicles.

Objective 2: To help the city work towards its carbon net zero objectives by reducing emissions and improving air quality as outlined in the corporate plan (Source: Brighton & Hove City Council plan 2023 to 2027). Prohibition of stopping directly reduces obstructions caused dangerous loading and nuisance parking through strict enforcement helping to reduce emissions from congested traffic and improving air quality. This is especially important as Western Road is a Low Emissions Zone.

Which key groups of people do you think are likely to be affected by the activity?

Age, Disability, Expatriates, Migrants, Asylum Seekers, Refugees, and Carers

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

Pre-engagement consultation

An online pre-engagement consultation was carried out to collect feedback on the initial design for the proposed Red Route. Leaflets containing the design and supporting information were distributed to households and businesses within the affected area, promoting the consultation and signposting

residents to the online survey. The design materials were also made available on the *Your Voice* platform. This platform has been tested for accessibility and ongoing improvements are made where necessary.

To support accessibility and inclusion, respondents were offered the option to request paper surveys by telephone, which could be returned by post via a pre-paid envelope. The option for the leaflet to be printed in other languages, formats such as easy read, large print, Braille or BSL was explained on the leaflets. In person requests were not explicitly offered at this time however we expect to meet residents and businesses through request throughout the project. Attendance to the Disabled Car User Advisory Group meetings (as outlined below) are held online via zoom at the request of the meeting organiser as this format best suits the accessibility needs of the group.

Analysis of the pre-engagement consultation feedback has been completed and due to be presented to members at Informal Cabinet. Once reviewed, the findings will be incorporated into this Equality Impact Assessment to inform the understanding of potential impacts on groups with protected characteristics.

Disabled Car User Advisory Group (DCUAG)

- **4 June 2025** – Red Routes Special
- **26 September 2025** – Red Route Workshop (Part 1)
- **7 October 2025** – Red Route Workshop (Part 2)
- Regular attendance at the bimonthly DCUAG meetings to provide project updates and listen to concerns.

During these sessions, officers presented the proposals and gathered feedback. The group highlighted that the introduction of a red route could impact disabled people's access to Western Road, including attending healthcare and other appointments, undertaking everyday shopping/leisure, receiving deliveries, and potential increases in taxi costs.

Across the two workshop meetings, officers shared visual maps of the existing Western Road layout and invited comments on suitable locations for disabled parking bays.

Constructive input from the group informed the decision to apply a maximum stay of three hours for all disabled bays along the proposed route. This measure aims to prevent long stay blue badge parking and improve availability for those who need access most.

Western Road Local Action Team (LAT) group

4 June 2025 – Western Road LAT Meeting
Officers attended this meeting to support Councillors in responding to residents and businesses concerns regarding the proposed Red Route. Discussions focused on how the proposals might affect businesses, including impacts on trading, access for customers, and receiving deliveries.

10 September 2025 – Western Road LAT Meeting: Red Route Workshop
Officers facilitated a workshop with residents and businesses, providing printed maps of the existing street layout and inviting feedback on preferred locations for loading and disabled bays. Officers also explained where restrictions must be applied, near crossings, bus stops, and junctions.

Officers will continue to attend DCUAG and LAT meetings throughout the project. Should the Red Route be implemented, this engagement will continue during the first six months of the Experimental Traffic Regulation Order.

Equalities data from the consultation:

Out of 1,032 participants 567 agreed to answer the equalities monitoring questions. The questions and answers follow below.

What is your age?	Responses
18 - 24	14
25 - 34	76
35 – 44	94
45 – 54	137
55-64	137
65 - 74	81
75 – 85	21
85+	1
Prefer not to say	3

A total of 564 responses were received across a range of age groups:

- 14 respondents were aged 18 to 24
- 76 respondents were aged 25 to 34
- 94 respondents were aged 35 to 44
- 137 respondents were aged 45 to 54
- 137 respondents were aged 55 to 64
- 81 respondents were aged 65 to 74
- 21 respondents were aged 75 to 85
- 1 respondent was aged 85 and over
- 3 respondents preferred not to say

Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?	Responses
Yes, a lot	45
Yes, a little	78
No	425
Prefer not to say	1

Respondents were asked whether their day-to-day activities are limited by a health problem or disability lasting, or expected to last, at least 12 months:

- 45 respondents said their activities are limited a lot
- 78 respondents said their activities are limited a little
- 425 respondents said their activities are not limited
- 1 respondent preferred not to say

Are you a carer?	Responses
Yes	46
No	506
Prefer not to say	13

Respondents were asked whether they are a carer:

- 46 respondents said they are a carer
- 506 respondents said they are not a carer
- 13 respondents preferred not to say

Is the gender you identify with the same as your sex registered at birth?	**Responses**
Yes	535
No	7
Prefer not to say	19

Respondents were asked whether the gender they identify with is the same as their sex registered at birth:

- 535 respondents said Yes
- 7 respondents said No
- 19 respondents preferred not to say

How would you describe your ethnic origin?	**Responses**
Asian / Asian British: Chinese	1
Asian / Asian British: Indian	3
Asian / Asian British: Other	5
Black / Black British: African	3
Black / Black British: Caribbean	3
Mixed: Any other mixed / multiple ethnic background	5
Mixed: Asian and White	7
Mixed: Black African and White	1
Mixed: Black Caribbean and White	3
Other ethnic group, please describe	1
Other Ethnic Group: Arab	4
White: English, Welsh, Scottish, Northern Irish, British	434
White: Gypsy or Irish Traveller	1
White: Other	57
Prefer not to say	22

Respondents were asked to describe their ethnic origin:

- 1 respondent identified as Asian or Asian British: Chinese
- 3 respondents identified as Asian or Asian British: Indian
- 5 respondents identified as Asian or Asian British: Other
- 3 respondents identified as Black or Black British: African
- 3 respondents identified as Black or Black British: Caribbean
- 5 respondents identified as Mixed: any other mixed or multiple ethnic background
- 7 respondents identified as Mixed: Asian and White

- 1 respondent identified as Mixed: Black African and White
- 3 respondents identified as Mixed: Black Caribbean and White
- 1 respondent selected other ethnic group (not specified)
- 4 respondents identified as Arab (Other ethnic group)
- 434 respondents identified as White: English, Welsh, Scottish, Northern Irish or British
- 1 respondent identified as White: Gypsy or Irish Traveller
- 57 respondents identified as White: Other
- 22 respondents preferred not to say

What is your religion or belief?	**Responses**
Agnostic	16
Atheist	56
Buddhist	8
Christian	96
Hindu	1
Jain	1
Jewish	4
Muslim	4
Pagan	2
Other philosophical belief	10
Other religion or belief, please describe	16
Prefer not to say	24

Respondents were asked about their religion or belief:

- 16 respondents identified as agnostic
- 56 respondents identified as atheist
- 8 respondents identified as Buddhist
- 96 respondents identified as Christian
- 1 respondent identified as Hindu
- 1 respondent identified as Jain
- 4 respondents identified as Jewish
- 4 respondents identified as Muslim
- 2 respondents identified as Pagan
- 10 respondents identified as having another philosophical belief
- 16 respondents selected another religion or belief (not specified)
- 24 respondents preferred not to say

The equality monitoring data presented above is self-reported and based on consultation responses only therefore may not be fully representative of all affected groups. Ongoing engagement of the proposed scheme will support the identification and management of any equality-related impacts as the project progresses. This will include continued engagement the DCUAG, alongside any other communication with residents, visitors and businesses through emails, meetings, on-site visits where appropriate, and LAT meetings.

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

(State Yes, No, Not Applicable as appropriate)

Age	No
Disability and inclusive adjustments, coverage under equality act and not	No
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	No
Religion, Belief, Spirituality, Faith, or Atheism	No
Gender Identity and Sex (including non-binary and Intersex people)	No
Gender Reassignment	No
Sexual Orientation	No
Marriage and Civil Partnership	No
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	No
Armed Forces Personnel, their families, and Veterans	No
Expatriates, Migrants, Asylum Seekers, and Refugees	No
Carers	No
Looked after children, Care Leavers, Care and fostering experienced people	No
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	No
Socio-economic Disadvantage	No
Homelessness and associated risk and vulnerability	No
Human Rights	No
Another relevant group (please specify here and add additional rows as needed)	No

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy, numeracy and /or digital barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered "NO" to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

Gathering equalities data for road users is limited, as road use is transient and anonymous, and personal data on protected characteristics cannot be captured through observational or traffic data. This EIA therefore uses a combination of local demographic data and engagement with representative groups to identify and assess potential impacts on protected groups.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

• Regular review of feedback from affected groups • Monitor traffic flow and air quality improvements • Track public transport reliability • Review accident statistics • Assess impact on local businesses • Regular consultation with stakeholder groups

6. Impacts

Advisory Note:

- **Impact:**
  - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
  - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean**: Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
  - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
  - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for Health inequalities, review guidance and inter-related impacts, and the impact of various identities.
  - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
  - **Consider a wide range (including but not limited to):**
    - Population and population groups
      - Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council
    - Census and local intelligence data

- Service specific data
- Community consultations
- Insights from customer feedback including complaints and survey results
- Lived experiences and qualitative data
- Joint Strategic Needs Assessment (JSNA) data
- Health Inequalities data
- Good practice research
- National data and reports relevant to the service
- Workforce, leaver, and recruitment data, surveys, insights
- Feedback from internal 'staff as residents' consultations
- Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
- Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

- Learn more about the Equality Act 2010 and about our Public Sector Equality Duty.

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: people who may be housebound, those under 16, young adults, with other intersections.	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

As identified in the 2021 census, the majority of Brighton and Hove City's population is aged 16-66 years of age, with:

- 15% under 16 years old
- 72% being 16 - 66 years old.
- 10% being 67- 84 years old.
- 2% being 85 or older.

Positives

- By being able to enforce no parking along Red Routes carriageway obstructions will be reduced providing a safer environment for road users of all ages.
- Improvement of journey times and reliability will positively impact all age groups
- Local air quality can be improved through reduced idling emissions supporting improved/sustained health of all ages - Improved air quality particularly benefits older people and young children who are more vulnerable to respiratory issues.
- More reliable bus services benefit older people who are more dependent on public transport

Negatives

- Lack of understanding of how Red Routes work with no stopping and the use of loading bay maybe harder to understand for older people who are more used to previous road conditions
- May impact elderly people being dropped off/picked up by family/carers

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- 19.5% of Brighton and Hove's population are disabled under the Equality Act:
- 8% experience day to day activities being limited a lot.
- 11.5% experience day to day activities being limited a little.
- There are 13,255 Blue Badge holders in Brighton and Hove.
- There are 8,894 disabled bus pass holders.

Disability age standardised - Census Maps, ONS

Positives

- Ease of traffic flow allows for safer roads
- Local air quality can be improved through reduced idling emissions
- Some disabled people rely on carers to travel safely and easily around the city.
- Loading bays allow stopping providing enough time for carers to pick up and drop off disabled clients
- Improved traffic flow benefits emergency vehicle access
- Better air quality benefits those with respiratory conditions
- Clearer road layout improves safety for people with visual impairments

Negative

- People with sight impairments can be affected by difficulties navigating and seeing changes to signage, barriers, and judging distances from other people.
- New restrictions being introduced can be anxiety-inducing for some people with mental health issues or neurodivergence due to uncertainty around the changes and rules.
- Relining works could cause disruption and works vans could be blocking spaces which could be used by Blue Badge holders.
- May impact those requiring door-to-door transport services, especially those who are housebound and rely on cars for everyday activities.
- Could affect those who need frequent rest stops due to mobility issues

What inclusive adjustments are you making for diverse disabled people impacted? For example: those who are housebound due to disability or disabling circumstances, D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

- Any consultation will be sent with an option to have the text in Braille, by phone, option for postal engagement and Your Voice, with a reasonable amount of time given for all responses. There will also be a number that anyone wishing to respond to the consultation can request a paper copy of the questions.
- Identify disabled parking bay provision on nearby side roads. - Completed along with a study showing a 50m radius between each proposed disabled bay in the Red Route design and on adjoining side streets.

- Meet with disability groups (Disabled Car Users' Group [DCUG], BADGE & Possability People) to discuss the Red Route and any issues they may have and specific needs and explore mitigations to reduce any disproportionate negative impacts
- Include our consultation findings and mitigation plans in a review and update of this EIA
- Blue Badge holders can be picked up or dropped off, so long as the vehicle is not parked. We will use discretion in cases where, for example, a wheelchair is being taken out of a vehicle.
- Implement clear signage
- When enforcement commences a minimum of a two-week period of warning letters followed by a two-week period of non-enforcement will alert any habitual illegal parking

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

This protected characteristic was consciously considered as part of this assessment. Based on the nature of the proposal, available local demographic data, engagement undertaken to date, and the fact that the restrictions apply universally to all road users, no evidence has been identified at this stage to indicate a disproportionate negative impact compared with the general population. This position will be kept under review as the project progresses.

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

This group was considered as part of the assessment, and no evidence has emerged from available data or engagement to suggest a disproportionate negative impact at this stage. Impacts will continue to be reviewed as monitoring and engagement progress.

6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- 88.1% of households have all adults with English as their main language.
- 5.4% of households have at least one adult with English as their main language.
- 1% of households have at least one person aged 3-15 with English as their main language but no adults.
- 5.4% of households have no people that have English as their main language. Census ONS
- 20% of residents were born outside of the UK. Council Plan 2023 to 2027.pdf

Positives

- Ease of traffic flow allows for safer roads
- Local air quality can be improved through reduced idling emissions

Negatives

- New restrictions being introduced can be anxiety inducing due to uncertainty around the changes and rules
- Non translated materials can cause anxiety, frustration, and information to not be conveyed fully

- Individuals who do not use English as their main language could be excluded if consultation materials are not appropriately translated
- Lack of consultation time could lead to exclusion for minority groups

6.12 Carers:

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- As of 15/10/2024 there are 3205 active Professional Carers Permits issued by Brighton & Hove City Council. These are permits issued by Brighton and Hove City Council to allow Professional Carers to park in any controlled parking zone within Brighton and Hove.
- Drivers with a valid blue badge can pick up and drop off on a Red Route.
- 1 in 12 residents provide unpaid care.

Positive

- Ease of traffic flow improves road safety and allows for safer roads
- Local air quality can be improved through reduced idling emissions
- Loading bays allow stopping providing enough time for carers to pick up and drop off people who are being cared for

Negative

- Potential for lack of loading and unloading spaces for carers to be able to drop off the person being cared for
- Potential for lack of disabled bays making it difficult for those with disabilities and for carers
- Having enough time in loading bays for carers to pick up or drop off cared for people in loading bays
- Loading bays not being close enough to the destination for those needing to be cared for

Mitigating action for negative impact

Discretion is used when monitoring activity on a Red Route and will be used to make a case-by-case decision on whether a ticket is issued.

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). **Also consider our Corporate Parenting Responsibility in connection to your activity.**	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- 4.3% of the population of Brighton and Hove are deprived in 3 dimensions according to the Census 2021 data.
- 36.2% of the households in Brighton and Hove are economically inactive according to the Census 2021 data.

Positive

- Ease of traffic flow and designated bays allows for safer roads with clearer line of sight of traffic
- 7,000 disabled people in the city have free bus passes and rely on buses to travel safely and easily around the city, and bus reliability is expected to improve.
- Red routes, loading and disabled bays provide for enough time for carers to pick up and drop off disabled clients
- Improved traffic flow benefits emergency vehicle access
- Clearer road layout improves safety for people with visual impairment

Negative

- People with sight impairments can be affected by difficulties navigating and seeing changes to signage, barriers, and judging distances from other people.
- New restrictions being introduced can be anxiety-inducing for some people with mental health issues or neurodivergence due to uncertainty around the changes and rules.
- Changes to restrictions could limit access by Blue Badge holders with sever mobility issues to some locations within the scheme area.
- May impact those requiring door-to-door transport services
- Could affect those who need frequent rest stops due to mobility issues

Mitigating Action for negative impact

- When enforcement commences a minimum of a two-week period of warning letters followed by a two-week period of non-enforcement will alert any habitual illegal parking.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.18 Cumulative, multiple intersectional, and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.

- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
    - People being housebound due to disabilities or disabling circumstances
    - Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
    - People experiencing homelessness
    - People on a low income and people living in the most deprived areas
    - People facing literacy, numeracy and/or digital barriers
    - Lone parents
    - People with experience of or living with addiction and/ or a substance use disorder (SUD)
    - Sex workers
    - Ex-offenders and people with unrelated convictions
    - People who have experienced female genital mutilation (FGM)
    - People who have experienced human trafficking or modern slavery

- Residents, business owners, traders and visitors will be impacted by the changes a Red Route brings. Though these impacts will be felt more or less by certain groups outlined in this assessment.
- Safer walking and cycling routes, along with improved public transport networks will provide alternatives to increasingly unaffordable car ownership.
- Overall vehicle access to Western Road could be impacted due to changes in ability to stop on the roadside.
- Work with representative groups in the city to understand transport and travel issues/concerns for protected groups and key local groups.

7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

- Conduct accessible and inclusive consultation and engagement on the Red Route proposal by 21/10/2025 and update this EIA with consultation findings to inform decision making at 15/12/2025 meeting.
- Contact disability groups BADGE, Possibility People and Disabled Car Users Group when consultation is carried out to consult over the Red Route in Western Road and better understand the impacts of the proposed project on disabled people. - Completed 24.11.2025
- Ensure those who English is not their first language have access to consultation for the Red Routes. This will be measured in replies received from those who do not use English as their first language or do not speak English or from different ethnic backgrounds. We will measure this at the end of consultation.
- Include our consultation findings and associated mitigation plans in a review and update of this EIA. Updated in section 4 as of 15/04/2026.
- The proposed Red Route would be implemented under an Experimental Traffic Regulation Order (ETRO) which means that changes can be made quickly in response to feedback, when

appropriate, much quicker than a formal Traffic Regulation order. The first 6 months of the ETRO will be another consultation period where we will be recording feedback.

- During the first few weeks of enforcement of the proposed Red Route there will be extra provision of Civil Enforcement Officers patrolling side roads off Western Road to discourage displacement or new anti-social parking.
- Monitor and review the location, availability, and time limits of proposed disabled and loading bays along and adjacent to Western Road. The project team have gathered feedback from the DCUG on the ideal time limit for disabled bays on Western Road which has informed the design. This will continue to be monitored throughout the project and into the ETRO period.Ahead of implementation project team to arrange clear and informative information via comms explaining the upcoming changes, loading arrangements and new disabled provision. To also include the enforcement approach in this. This information to be accessible and able to be provided in alternative formats when required. This information will also be relayed at the DCUAG meetings.
- Continue structured engagement with disability and carer representative groups to identify access issues, test mitigations, and inform adjustments during the experimental phase. At least one project officer to join the DCUG meetings by monthly and respond to queries/concerns as well as complete any actions for the team. This will be continued during the ETRO period.
- Review this Equality Impact Assessment using feedback, monitoring data, and engagement findings to assess whether mitigation measures remain effective. EIA to be regularly updated with oversight and input from the Equalities team. This is to be continued through the ETRO process.

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

Western Road Project team plan

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	**X**
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	

If your decision is to “Proceed with caution”, please provide a reasoning for this:

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

Throughout this EIA it has become clear that there is a need for Red Route specific consultation. Consultation will be required to allow the local population to address any concerns with the Red Routes and so that people will be aware of new restrictions in the area. Publicity will also be required to make the wider public aware of the new Red Routes, the restrictions loading/disabled bays. Overall, the project will have a positive impact on the area, improving road safety and air quality by reducing idling emissions. This is in line with the council's commitment to be a Carbon Neutral City by 2030.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

10. Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Flora McLeod, Senior Parking Projects Officer	29/04/2026
Accountable Manager:	Peter Turner, Senior Parking Projects Manager	29/04/2026

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service,

Business Improvement Manager, Equalities inbox, any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing. Budget and Staffing EIAs secure EDI Manager and HEad of Service level approval via different templates.

Signatory:	**Name:**	**Date:** DD-MMM-YY
EDI Business Partner:	Zofia Danin	11-Jun-2026
EDI Manager:	Lindsey Pearce	29-Jul-2026

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment:

= A 50 metre radius from each disabled parking space

Proposed Loading Bay

Red Route

Existing Disabled Bay

Proposed Disabled Bay

N

Project : Western Road Red Route	PARKING PROJECTS	Scale : NTS	Brighton & Hove City Council
	TRANSPORT	Date : APR26	
Title : Red Route Disabled Bay Radius		Drawn : JE	
		Drawing Number : B&H/PPT/WRS001	

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Existing Disabled Bay
Red Route
Proposed Disabled Bay
Proposed Loading Bay
N
LANSDOWNE PLACE
FARM ROAD
BRUNSWICK PLACE
CAMBRIDGE ROAD
BRUNSWICK ROAD
YORK ROAD
WESTERN ROAD
BRUNSWICK STREET WEST
BRUNSWICK SQUARE
BRUNSWICK STREET EAST
LOWER MARKET STREET
WATERLOO STREET
CRUSS STREET
NORFOLK SQUARE
NORFOLK PLACE
BEDFORD PLACE
MONTPELIER ROAD
MONTPELIER PLACE
BORROUGH STREET
TEMPLE STREET
ALICE STREET
LANSDOWNE SQUARE
LANSDOWNE MEWS
BRUNSWICK MEWS
DONKEY MEWS
IVY MEWS
GOLDEN LANE
St Patrick's Church
Sheridan House
The Old Market
New Venture Theatre
Christchurch House
Masque
Dudley Mansions
Holland Road Baptist Church
St Michael's Lodge
Kadampa Meditation Centre
Park Royal
St Stephens
Tesco Express
Shelter
Tree
Tree Pit
Bus stop
Taxi rank
Loading bay
Disabled bay
Pay & display
Cycle parking
Zebra crossing
Pedestrian crossing
Traffic signals
Bollard
Lamp post
Telephone
Post box
Litter bin
Recycling
Public toilets
Health Centre
Sub Sta
Hall
Church
Mosque
Theatre
Hotel
Pub
Restaurant
Shop
Supermarket
Offices
Flats
Residential
Car park
Garage
Vehicle access
Footway
Carriageway
Kerb
Road marking
Double yellow lines
Single yellow line
Red route
Bus lane
Cycle lane
Cycle route
Contraflow
One way
Give way
Stop
Speed limit
Traffic calming
Speed cushion
Raised table
Build out
Island
Refuge
Central reservation
Footpath
Steps
Ramp
Dropped kerb
Tactile paving
Guard rail
Railings
Wall
Fence
Hedge
Boundary
Building
Roof
Chimney
Window
Door
Entrance
Exit
Sign
Post
Pole
Cable
Manhole
Gully
Drain
Inspection chamber
Water main
Gas main
Electricity
Telecoms
Fibre optic
Underground
Overhead
Level
Contour
Spot height
Benchmark
Trig point
Survey point
Control point
Reference point
Grid line
Coordinate
Scale bar
Legend
Key
Title block
Drawing number
Revision
Date
Author
Checked
Approved
Status
Project
Client
Council
Brighton & Hove City Council
Parking Design & Implementation
Western Road Red Route
A0
Western Road Survey
© Crown Copyright. Licence: OS AC0000849956. Brighton & Hove City Council, 2026.
Scale: nts
Original Drawing Size: A0
Date Drawn: ---
Drawn: JE
Checked: ---
Approved: ---
Drawing status: INPRGS
Drawing Number: BH/WRRRA0-01
Rev: ---

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Appendix 5

Summary of issues raised in the Pre-Action Protocol Letter and the Council's response.

Issue Raised	Response	Notes
Predetermination and Improper Purpose	Restate purpose in cabinet report to track congestion and improve bus journey times. This expectation is based on evidence from the implementation of sufficiently comparable previous red route schemes and is consistent with national and local policy on improving bus service provision. The long term expected net income is budgeted to be £50k annually, on an ongoing basis following a short-term spike from PCN issue. The use of an ETRO for Western Road is justified in line with the statutory provisions because it enables the Council to test the effectiveness of the proposed red route in a complex and heavily used urban environment, collect evidence on actual impacts, consider feedback from affected stakeholders, and make quick changes where necessary before deciding whether a permanent Traffic Regulation Order should be introduced. The proposals include warning letters and a period of non-enforcement to address potential early spiking of PCN liability during the initial weeks of the scheme.	Experience with the previous schemes shows a short-term spike in PCN income followed by a fall as compliance improves. £50k net surplus income on an ongoing basis is minimal in relation to the overall parking surplus of £23m.
Failure to consult fairly	There is no statutory duty to consult prior to the ETRO. Officers and Cllr Muten have carried out pre-engagement on the design of the scheme as well as the Your Voice consultation. The statutory consultation of the ETRO starts when the scheme is in place for a period of 18 months. The earlier informal consultation complied with legal requirements.	The consultation shows that a small majority of respondents felt that the proposals would improve safety and bus reliability.
Failure to discharge the Section 122 balancing duty	The Council considers that the section 122 balancing exercise strongly supports implementation of the Western Road ETRO. The primary aim is to improve bus journeys, alongside associated benefits including reduced congestion, improved road safety and more reliable public transport services. The proposed areas for stopping and loading have been designed in conjunction with the Council's Road Safety department and many visits with them have occurred during the design phase. It is a proper conclusion from previous experience and the information available to the Council that	Experience with previous red routes has shown a reduction in congestion and collisions, improved bus reliability and a small increase in footfall.

	introducing a scheme can be expected to increase materially and over time levels of footfall and improve materially and over time air quality as a result of reductions in congestion. The Council is content that issues in relation to access can be addressed by appropriate relaxations of the red route (in relation, for example, to disabled users) and the provision of disabled parking bays and loading bays. In short, the section 122 balance is amply met in this case. The Council considers that it favours the implementation of the ETRO so that a full evaluation of its impacts can take place	
Failure to discharge the public sector equality duty	The cabinet report explains that the EIA is a live document which will continue to be updated, and that the Council has had proper regard to its duties under section 149 of the Equality Act 2010. It states that improving public service provision, while making appropriate allowances and adjustments for disabled people and others who need to access the area, can positively advance equality. The Council highlights engagement and feedback from disabled action groups, which informed the provision of additional disabled parking bays along the route to ensure access to services within a 50-metre radius and will be monitored during the ETRO period.	There are exemptions for passengers to be dropped off on a red route.
Breech of legitimate expectation	The ETRO statutory scheme provides for a formal statutory consultation. That process has not yet started. there will be a further opportunity to be heard during the ETRO operation, should the scheme be made, with the benefit of stakeholders, as well as the Council, being able to fully evaluate the scheme in operation.	The ETRO provides an opportunity to rapidly adjust bays e.g. to improve access as required.
Misclassification as a non-key decision	The Cabinet Member Decision was classed as a non-key decision as it was to approve the plan to start the scheme whereas the key decision to design and implement the scheme was taken in March 2025.	By going back to Cabinet as key decision and including the consultation and other information this legal point is fully met.
Apparent bias	This is being addressed by the cabinet report being an officer report presented by the Corporate Director, rather than lead cabinet member report, and a fresh decision being taken by cabinet as a whole.	

Appendix 6: Project Chronology

2020 onwards

The Western Road corridor between Holland Road and Montpelier Road has experienced persistent issues associated with obstructive and antisocial parking, particularly around areas subject to waiting restrictions. The issue of poor parking has had an ongoing negative impact on bus journey times at this key pinch point and throughout the city. The route forms a key transport corridor carrying approximately 80 to 100 bus movements per hour at peak times or around 700 per day, together with significant pedestrian, servicing and general traffic activity. Enforcement activity has remained amongst the highest in the city. There are almost weekly complaints from members of the public to the city's enforcement line about large numbers of vehicles parked on double yellow lines in the area. In response there were 470 visits from enforcement officers from August 2025 to the end of March 2026 and 705 visits from April 2026 to the beginning of August 2026. During 2025/26, 684 Penalty Charge Notices were issued alongside 2,315 recorded Vehicles Driven Away during the observation period before a Penalty Charge Notice could be issued.

June 2021 (Local Transport Plan 5)

The Environment, Transport & Sustainability Committee approved the vision, key outcomes and principles for the development of the Council's fifth Local Transport Plan, now known as Our City Transport Plan 2035, and authorised public engagement on future transport priorities. The emerging plan identified objectives including increasing public transport use, improving road safety, reducing congestion, improving air quality, supporting active travel and creating a safe, inclusive and integrated transport network. The objectives of the Red Route programme support the delivery of these wider transport priorities.

22 June 2021 (Committee)

The Environment, Transport & Sustainability Committee under the previous administration considered the Network Management Action Plan. The Action Plan included proposals to introduce experimental Red Routes on strategic routes within the city together with additional traffic management and enforcement measures.

22 July 2021 (Policy and Resources Recovery Sub-Committee)

Committee agrees to the funding of £770,000 for additional staff to work in the Traffic Control Centre from 2022/23. This is to resource a Red Route trial, development of the LTP5 and the 2030 transport vision, CCTV enforcement of Mandatory cycle lanes, upcoming Moving Traffic Regulation powers, CCTV enforcement of Bus Lanes. As well as supporting the enforcement of a wider Ultra Low Emission Zone and Liveable (car free) City Centre. However, not all of these projects were progressed before the end of the term of the previous administration.

March 2022 (Local Cycling and Walking Infrastructure Plan)

The Environment, Transport & Sustainability Committee approved the Local Cycling and Walking Infrastructure Plan (LCWIP). The LCWIP identified opportunities to improve conditions for walking and cycling across the city and was developed using collision data, traffic data, area studies and consultation evidence. One of the objectives of the Red Route programme is to reduce obstructive parking in cycle lanes and on key transport corridors, improving safety and reducing conflicts between cyclists and parked vehicles. The objectives of the Western Road Red Route are consistent with the wider active travel and network management priorities set out in the LCWIP.

May 2023 (Brighton & Hove City Council election)

New Labour administration majority.

5 December 2023 (Committee)

The Transport & Sustainability Committee considered the outcomes of consultation on the Lewes Road, London Road and Preston Road Red Routes and approved progression to the Experimental Traffic Regulation Order stage for those schemes.

April 2024 (Implementation)

Experimental Red Routes were introduced on Lewes Road, London Road and Preston Road. The schemes were funded through the Department for Transport Bus Service Improvement Plan (BSIP) and were introduced primarily to improve bus reliability, reduce congestion and tackle antisocial parking on key transport corridors.

August 2024 (Case Study)

Transport for the Southeast (TfSE) published a case study on Brighton & Hove City Council's Red Route programme through its Centre of Excellence knowledge sharing platform. The case study highlighted the objectives of the scheme, including improving bus reliability, reducing congestion, tackling antisocial parking and supporting the efficient operation of key transport corridors. The publication provided external recognition of the Council's approach and shared lessons learned with transport authorities across the Southeast

April 2024 to March 2025 (ETRO Consultation period)

2025 (Our City Transport Plan 2035)

The Council continued development of Our City Transport Plan 2035, (LTP 5). The draft plan includes objectives to increase public transport use, deliver a safe and integrated transport system, promote active travel, reduce emissions and improve network efficiency. The objectives of the Western Road Red Route align with these wider strategic transport priorities.

20 March 2025 (Cabinet)

Cabinet considered the Red Routes Update report, reviewed monitoring data relating to bus passenger safety, air quality in London and Lewes Road. Cabinet approved the design and implementation of a Red Route on Western Road between Holland Road and Montpelier Road.

4 June 2025 (Brunswick & Adelaide LAT)

The proposed Western Road Red Route was discussed at the Brunswick & Adelaide Local Area Transport Meeting where local issues relating to access, loading, parking and operation of the corridor were considered.

Spring to Autumn 2025

Detailed design work commenced for the Western Road Red Route, including site surveys, traffic management design development, loading bay assessments, disabled parking assessments, engagement with transport operators, engagement with enforcement services, accessibility stakeholder engagement and scheme development.

10 September 2025

A Western Road Red Route map workshop was held with Local Area Transport representatives to review loading arrangements, parking provision, traffic management proposals and operational aspects of the proposed scheme.

24 November 2025 to 4 January 2026

A public consultation on the proposed Western Road Red Route was undertaken through the Council's Your Voice platform. More than 4,700 consultation leaflets were distributed to properties within the scheme area and surrounding streets. Your Voice Consultation on the proposal received 1,032 responses.

Headline figures

50% of respondents felt it would make the area safer
53% felt it would speed up bus journey times
56% felt it would keep traffic moving

January to May 2026

Consultation responses were reviewed and taken into account in the final scheme design. Further engagement took place with Brighton & Hove Buses, Stagecoach, Sussex Police, NSL, Cycling UK, Bricycles, Local Area Transport groups, ward councillors, businesses and residents.

24 April 2026 (Press release on existing Lewes & London Road Red Routes)

Following 2 years of implementation of the existing Red Routes a review was undertaken of the data available to assess the impact of the Lewes and London Road red route schemes. This identified improvements in bus reliability, reductions in bus passenger injury

incidents, reductions in collisions, improvements in air quality indicators and increased footfall within monitored locations.

12 June 2026

The Cabinet Member for Transport & City Infrastructure considered the report Permission to Proceed with Experimental Traffic Regulation Order for Western Road Red Route. The decision considered the consultation results, reviewed the completed scheme design, considered the Equality Impact Assessment and approved implementation of the Experimental Traffic Regulation Order.

Summer 2026

Implementation planning commenced for the Experimental Traffic Regulation Order, including Traffic Order preparation, signage and lining design, enforcement arrangements, communications planning and coordination with the planned Western Road resurfacing and reconstruction programme.

July to August 2026

Detailed planning commenced for the Western Road resurfacing and reconstruction scheme covering the section of Western Road between Holland Road and Montpelier Road. The project formed part of the Council's planned highway maintenance programme and involved substantially more extensive works than a standard resurfacing scheme due to the condition of the carriageway and the extent of reconstruction required.

August 2026

Trial holes, ground investigations and structural testing were undertaken to better understand the construction of the road and the load-bearing capacity of the underlying carriageway structure.

August 2026 (Construction Methodology)

A preferred traffic management approach based on a full road closures was identified as the safest and most efficient construction methodology for undertaking the reconstruction works.

August 2026 (Bus Diversions)

Planning commenced for bus diversion routes and wider traffic management arrangements associated with the resurfacing programme. Proposed diversion routes were developed in partnership with bus operators and transport stakeholders.

August 2026 (Business Engagement)

Initial engagement commenced with businesses regarding the resurfacing programme, including deliveries and servicing, loading arrangements, access to premises, customer access and measures to mitigate the impact of construction activity on businesses.

28 September 2026 to approximately 12 November 2026 (Planned)

Subject to weather conditions and unforeseen construction issues, the Western Road reconstruction and resurfacing programme is scheduled to commence on 28 September 2026 and continue for approximately 45 days. The works are expected to include utility investigations, carriageway reconstruction, drainage repairs, resurfacing, ironwork adjustment and temporary traffic management arrangements.

Autumn 2026 (Anticipated)

Subject to completion of all necessary legal and operational requirements, the Western Road Experimental Traffic Regulation Order is anticipated to be implemented. The programme is expected to include installation of road markings and signage, camera enforcement arrangements, an initial warning period before full enforcement commences, monitoring of loading bay usage, disabled parking provision and traffic flow, together with ongoing engagement with businesses, residents and accessibility groups throughout the experimental period.

Additional Meetings Featuring Red Route Agenda Items

Disabled Car User Advisory Group

The meetings listed below included either dedicated Red Route discussions or Red Route updates as part of the wider agenda. See report for details.

- 4 June 2025
- 26 September 2025
- 7 October 2025
- 22 October 2025
- 17 December 2025
- 4 February 2026
- 25 March 2026
- 17 June 2026
- 12 August 2026

Bus network operation meetings

Attended meetings where Red Routes were discussed, and updates given.

- 6 March 2025
- 3 April 2025
- 1 May 2025
- 5 June 2025
- 4 September 2025
- 2 October 2025
- 13 November 2025
- 4 December 2025
- 8 January 2026

- 5 February 2026
- 5 March 2026
- 2 April 2026
- 7 May 2026
- 4 June 2026
- 6 August 2026

Brighton & Hove City Council

Cabinet

Agenda Item 58

Subject: **Targeted Budget Management (TBM) 2026/27 Month 4 (July)**

Date of meeting: **Thursday, 17 September 2026**

Report of: **Cabinet Member for Finance & City Regeneration**

Contact Officer: **Elizabeth Griffiths, Director of Finance & Property**
Haley Woollard, Deputy Chief Financial Officer
Email: **elizabeth.griffiths@brighton-hove.gov.uk**
haley.woollard@brighton-hove.gov.uk

Ward(s) affected: (All Wards)

Key Decision: Yes

Reason(s) Key: Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000 and is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1 Purpose of the report and policy context

1.1 The Targeted Budget Monitoring (TBM) report is a key component of the council's overall performance monitoring and control framework. This report sets out an indication of forecast risks as at Month 4 on the council's revenue budget for the financial year 2026/27. Effective financial management is a core component of providing a well-run council, a key priority within the Council Plan that demonstrates that the council manages within its finite resources and optimises the use of those resources.

2 Recommendations

2.1 Cabinet notes the forecast risk position for the General Fund, which indicates a potential forecast overspend risk of £20.852m

2.2 Cabinet notes the additional risks of £16.949m included in the table at Appendix 2 which are not included in the forecast figure above.

2.3 Cabinet notes the forecast overspend risk for the separate Housing Revenue Account (HRA), which is an overspend of £0.991m.

2.4 Cabinet notes the forecast overspend risk for the ring-fenced Dedicated Schools Grant, which is an overspend of £8.925m in year.

2.5 Cabinet notes the current RAG rating of the transformation workstreams at Appendix 3.

2.6 Cabinet approves the addition of new projects to the capital programme totalling £0.671m as set out in the Part 2 report.

3 Overview

3.1 The forecast outturn position at month 4 for the current financial year 2026/27 is an overspend of £20.852m with an additional table of risks totalling £16.949m

Directorate	TBM Budget Month 4 £'000	Forecast Outturn Month 4 £'000	Forecast Variance Month 4 £'000	Forecast Variance Month 4 %	Forecast Variance Month 3 £'000	Movement Month 3 to Month 4 £'000
Families, Children & Wellbeing	92,535	96,134	3,599	3.9%	3,668	(69)
Homes & Adult Social Care	160,867	172,867	12,000	7.5%	11,847	153
City Operations	47,415	49,554	2,139	4.5%	1,343	796
Central Hub	31,737	32,299	562	1.8%	793	(231)
Sub Total	332,554	350,854	18,300	5.5%	17,651	649
Centrally-held Budgets	16,807	19,359	2,552	15.2%	2,552	0
Total General Fund	349,361	370,213	20,852	6.0%	20,203	649

3.2 Month 3 monitoring was undertaken as part of the monitoring cycle and used by directorates and corporate leadership, but not reported publicly, therefore the comparison in the movement of the variances reported above relate to month 3. For reference, the position at month 3 is shown below:

Directorate	TBM Budget Month 3 £'000	Forecast Outturn Month 3 £'000	Forecast Variance Month 3 £'000	Forecast Variance Month 3 %	Forecast Variance Month 2 £'000	Movement Month 2 to Month 3 £'000
Families, Children & Wellbeing	92,870	96,538	3,668	3.9%	3,679	(11)
Homes & Adult Social Care	160,867	172,714	11,847	7.4%	12,883	(1,036)
City Operations	47,406	48,749	1,343	2.8%	(242)	1,585
Central Hub	31,912	32,705	793	2.5%	1,010	(217)
Sub Total	333,055	350,706	17,651	5.3%	17,330	321
Centrally-held Budgets	16,807	19,359	2,552	15.2%	2,552	0
Total General Fund	349,862	370,065	20,203	5.8%	19,882	321

3.3 The forecast has deteriorated slightly but remains relatively stable. The key movement is that some of the risks previously reported in City Ops have crystallised and become part of the forecast meaning that the projected overspend has increased and the risks reported on the risk table have reduced.

3.4 Forecast income in City Ops is higher than in 2026/27 but lower than the budgeted expectation. With the summer season bringing a significant increase in parking income, if the projection has not improved in the next few weeks, it may not recover before year end.

3.5 In FCW, overspends have been mitigated by a significantly improved position in the schools PFI contract. This had been anticipated to be a continuing pressure but has stabilised and continues to level off, which bodes well for the remainder of the contract term through 2027/28.

3.6 There is a concern however that in previous years, the number of residential placements reaches a notable peak over the summer months. This combined with the potential for a large increase in the cost of home to school transport when schools return in September means that there is anticipated risk in the forecast that cannot be quantified but, if realised, the financial implications will

be felt in the coming quarter. There are currently some residential placements that cost around £20k per week which means that a very small change in numbers either way can change the overall forecast significantly.

3.7 In HASC, additional rough sleepers grant in year will help support some areas of high financial pressure while providing broader and more wholistic solutions for mental health, drug and alcohol related issues.

3.8 The overspend on the HRA is improving. There was a recognition that when using properties for temporary accommodation, readying the property takes longer. While tenants moving into properties requiring minor repairs or decoration can be given an allowance to carry out the works, for TA use, the works are done ahead of the move. This leads to longer void periods and reduced rental income. The service has invested in new framework contractors and additional staff to turn the properties around faster. This means that people can be housed sooner and we avoid long periods with no rental income.

3.9 All services continue to report good progress on their transformation programmes which are having a positive effect on their position but are currently unable to keep pace with the rise in numbers and costs. The transformation programmes are overseen by the Innovation and Savings Delivery Board which reports into CLT. An update on the current position of the projects is shown at Appendix 3. Workstreams have two RAG ratings. One for project delivery and one for savings delivery. This is because it is entirely possible to have a well managed project which is delivering according to plan (and therefore RAG'd green) but because demand or other factors are overtaking the outcomes, the anticipated savings are not being realised. It should be noted that even when the anticipated savings are reduced, a successful project provides significant cost mitigation against a position which would have been worse.

Directorate	● £`000	● £`000	● £`000	● £`000	● £`000	Total £`000
Families, Children & Wellbeing	0	204	239	155	423	1,021
Homes & Adult Social Care	0	829	5,664	8,442	300	15,235
City Operations	220	433	453	2,792	60	3,958
Central Hub	300	0	535	200	10	1,045
Centrally-held Budgets	1,125	0	0	0	0	1,125
Total General Fund	1,645	1,466	6,891	11,589	793	22,384
DSG	0	0	0	0	0	0
HRA	0	0	0	0	0	0
Total Council	1,645	1,466	6,891	11,589	793	22,384

3.10 Savings in service budgets, not linked to transformation projects are also delivering well with 67% either already delivered or strongly expected to be.

Directorate	● £`000	● £`000	● £`000	● £`000	● £`000	Total £`000
Families, Children & Wellbeing	0	400	0	968	248	1,616
Homes & Adult Social Care	0	0	0	23	0	23
City Operations	375	0	265	356	268	1,264
Central Hub	0	0	614	798	213	1,625
Centrally-held Budgets	0	0	450	1,550	0	2,000
Total General Fund	375	400	1,329	3,695	729	6,528
DSG	0	0	0	0	0	0
HRA	0	0	0	0	0	0
Total Council	375	400	1,329	3,695	729	6,528

3.11 Savings are RAG'd as follows:

- Grey – the actions required have not yet been planned.
- Red – the actions are understood but unlikely to happen or have an effect.
- Amber – the actions are underway but the outcome is still uncertain.
- Green – there is a strong expectation of a successful outcome.
- Blue – the saving has already been delivered.

3.12 Detailed reports on all areas are included in Appendix 1 which shows forecasts, explanations for notable variances, current and planned mitigations, savings delivery and supporting data for each service area.

3.13 Appendix 1 also shows the expected variances on the Housing Revenue Account (HRA) and the Dedicated Schools Grant (DSG) which, while outside the reported revenue position of the Council are still the responsibility of the Council to manage. These are showing overspends of £0.991m and £8.925m respectively with the large overspend in the DSG being driven by increased demand in the High Needs Block. The Department for Education continues to scrutinise closely the past expenditure on the DSG, as it is doing with all Councils currently in preparation for the partial write off of overspends. This is seen as a low risk as previous BHCC expenditure has been compliant and the overspends relatively low compared to other councils, but since the overall value of DSG expenditure is so high, this is acknowledged as a potential threat.

CIPFA review / Financial controls

3.14 BHCC has undergone a review by CIPFA on behalf of MHCLG which scrutinised our financial resilience and our organisational response to the budgetary pressures that we're facing.

3.15 A list of recommendations was received which are either in the course of being implemented or have already been implemented. These will be updated to CIPFA when they return at the end of September for a follow up visit. All of the areas highlighted were areas that the organisation was already aware of and had started to address. One of the points raised was the volume of the financial reports which they felt could have been more focused to highlight the key concerns to users. This has been addressed in the new format with information being updated in a timely manner, on a more

frequent basis, and the key concerns being summarised succinctly for the user.

3.16 In response to the forecast overspend, Directorates have been keeping strong oversight of recruitment with all vacancies being approved at DLT level by directors / corporate directors. CLT ultimately oversees all expenditure and savings and receives monthly reports from Finance in conjunction with the Innovation and Savings Delivery board on the forecast, the performance against savings and the delivery of transformation programme workstreams.

New Capital Expenditure

3.17 Additional capital funding is being requested for investment in a new system as detailed in the part two report.

3.18 A full update on the capital programme will be included in TBM5.

4 Analysis and consideration of alternative options

4.1 The forecast outturn on General Fund budgets is an overspend of £20.852m with additional risks of £16.949m. This exceeds the Council's available reserves and likely ability to mitigate and therefore will require additional EFS.

5 Community engagement and consultation

5.1 No specific consultation has been undertaken in relation to this report.

6 Financial implications

6.1 The financial implications are covered in the main body of the report and appendices. Financial performance is kept under review on a monthly basis by the Corporate Leadership Team and Cabinet and the management and treatment of strategic financial risks is considered by the Audit, Standards & General Purposes Committee.

Finance Officer consulted: Elizabeth Griffiths Date: 31/08/2026

7 Legal implications

7.1 Decisions taken in relation to the budget must enable the council to observe its legal duty to achieve best value by securing continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. The council must also comply with its general fiduciary duties to its Council Tax payers by acting with financial prudence, and bear in mind the reserve powers of the Secretary of State under the Local Government Act 1999 to limit Council Tax & precepts.

7.2 The Council has a legal obligation to set a balanced budget on an annual basis as prescribed in the Local Government and Finance Act 1992 and associated Regulations. The recommendations contained in this report will assist in the discharge of that obligation.

Lawyer consulted: Elizabeth Culbert Date: 09/09/2026

8 Risk implications

8.1 The risk in the forecast figures has been outlined in Appendix 2 which contains estimates of further risk from all services that have not yet been included in the forecast figures because of their level of uncertainty.

8.2 The larger risk is that if our request for further EFS is not approved, the Council's Chief Financial Officer would be forced to file a S114 report on the grounds that expected expenditure in the current financial year cannot be met by expected income.

9 Equalities implications

9.1 There are no direct equalities implications arising from this report.

10 Sustainability implications

10.1 An inability to bring the budget back into balance would require the Council to file a S114 report so, in conjunction with EFS, continuing efforts to reduce this overspend must be pursued with the objective of removing our reliance on EFS.

11 Health and Wellbeing Implications:

11.1 The council's budget includes many statutory and preventative services aimed at supporting vulnerable children and adults. The budget prioritises support to these core and critical services including management of any emerging in-year pressures to minimise impacts on statutory provision.

12 Conclusion and comments of the Chief Finance Officer (Section 151 Officer)

12.1 The position at TBM4 is a significant projected overspend driven by underlying pressures in service spending carried forward from 2025/26 and continuing into 2026/27 and additional spend above budget agreed earlier in the year. Savings have been evaluated based on current expectations of delivery which has increased the forecast but will continue to be pressed not only to increase the chances of success but to continuously find alternative savings to mitigate the position.

12.2 The forecast position has required the Council to approach MHCLG to request more Exceptional Financial Support for 2026/27, expected to be a sum of up to £30m. It should be noted that this is additional borrowing, not additional funding.

Supporting Documentation

Appendices

1. Forecast Dashboards by Service
2. Additional risks not included in the forecast
3. Update on the progress of Transformation programmes and key risks

Family Help & Protection

Revenue Budget Summary	Month 4 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 3
Children in Care Placements	31,532	34,431	2,899	9.19%	↑
Disability Family Support	370	676	306	82.70%	=
Children in Care Mental Health Contract	-	100	100	0.00%	=
Families First and Social Work	17,496	16,846	(650)	-3.72%	↑
Preventive (Section 17)	491	365	(126)	-25.66%	↓
In-House Residential & Respite	3,833	4,073	240	6.26%	=
Fostering & Adoption	4,819	4,734	(85)	-1.76%	↑
Other	4,974	5,314	340	6.84%	↓
Total	63,515	66,539	3,024	4.76%	↓

Key Variances

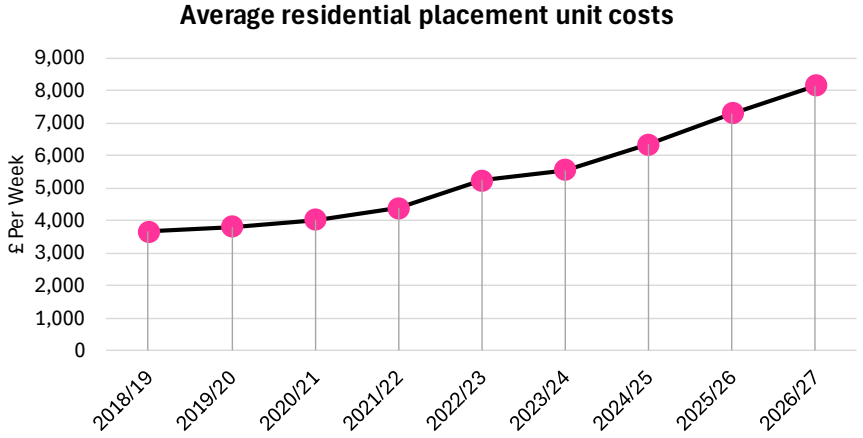
The Children in care placements budget remains difficult to manage despite mitigating initiatives, the main driver is high numbers and increasing unit costs of residential placements. The budget is 25.5 FTE and there are currently 31 children in placement plus another in a court directed residential family assessment place. Intense effort is underway to move children on safely to foster care which is working but new children with complex, high risk needs then enter residential care, so there is turnover despite the number showing as relatively static. In addition, there is an unachieved saving of £0.100m on the CiC mental health contract due to PH funding being redirected in 2025/26. These overspends are likely to be off-set this year by underspends on Families First and prevention which are currently shown in the Financial Recovery Plan. The forecast includes assumed savings achieved of £1.391m.

Risks & Mitigations

The Children's Placements budget continues to face significant pressure as a result of increasing complexity of need, limited placement sufficiency and rising placement costs. A small number of children with acute safeguarding risks require highly specialised placements at substantial cost. In addition, current market conditions have reduced provider engagement with framework arrangements leading to the necessity to make more placements outside of the framework contract at higher rates.Ongoing challenges in foster carer recruitment continue to constrain family-based placement capacity and increase the use of more expensive alternatives. The number of children in care remains relatively stable, with demand pressures being effectively managed through high-quality social work intervention and transformation initiatives such as reunification and Fostering. Nevertheless, challenges associated with children with complex needs, the local care provider market, and constraints in fostering options have resulted in significant cost pressures on the placement budget.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	100	-	582	42	**724**
Pressure mitigations	-	-	-	-	-	**-**
Transformation programmes	-	-	239	105	423	**767**
Total	**-**	**100**	**239**	**687**	**465**	**1,491**



Average cost of residential home placements has increased considerably since 2023/24. A combination of children coming into care with significantly complex needs, local market conditions and external impacts of other factors like inflation and pay growth, has resulted in a 47% rise since March 2024.

Education, Community & Public Health

Revenue Budget Summary	Month 4 Budget £'000	Forecast Outturn £'000	Variance £'000	Variance %	DoT To Month 3
English as an Additional Language and Traveller Service	-	434	434	0.00%	=
Public Health contribution to Schools Wellbeing	(200)	-	200	100.00%	=
Schools PFI	1,209	809	(400)	-33.09%	↑
Early years & Nurseries	1,777	1,797	20	1.13%	↓
Home to School Transport	9,152	9,554	402	4.39%	↑
Libraries	4,211	4,369	158	3.75%	↑
Community Cohesion	3,011	3,058	47	1.56%	=
Other	9,860	9,574	(286)	-2.90%	↑
Total	29,020	29,595	575	1.98%	↑

Key Variances

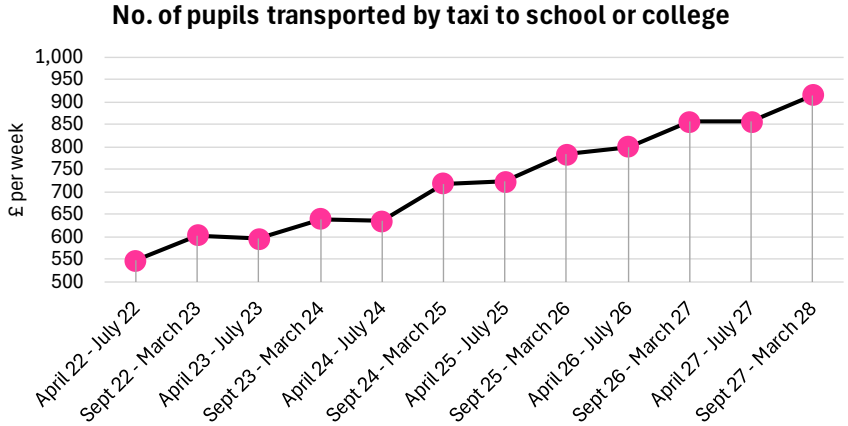
Schools ceased de-delegation of funds to the English as an Additional Language and Traveller Service (EALTS) meaning that the service needs to operate on a fully traded basis. Income from schools is insufficient to maintain the previous level of service and a restructure is now planned. However, this will not take effect until later in the year meaning a significant overspend for the 2026/27 financial year. In addition, the previously agreed Public Health funding of £0.200m for the Schools Wellbeing Service has now been redirected leaving a shortfall in this budget. The Home to School Transport budget continues to be under pressure with current forecasts indicating that, on average, there will be 31 more pupils eligible for transport than originally anticipated in the budget. The impact of fuel price volatility has been accounted for in this forecast. The forecast includes assumed savings achieved of £0.642m

Risks & Mitigations

There remains a risk that pupil numbers eligible for Home to School Transport from September will increase beyond the level assumed within the budget, which has been based on previous year trends. Together with ongoing volatility in the taxi market, this creates a risk of further pressure against the forecast outturn. Mitigating action continues to be taken through active cost management by the transport team, with particular focus on personal travel budgets and route optimisation.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	300	-	386	206	**892**
Pressure mitigations	-	-	-	-	-	**-**
Transformation programmes	-	204	-	50	-	**254**
Total	**-**	**504**	**-**	**436**	**206**	**1,146**



In recent years there has been a substantial increase in both the number of pupils eligible for transport and the average cost per pupil. Since the beginning of the 2022/23 financial year there has been an increase of 57% in the number of pupils transported by taxi and a 53% increase in the average cost.

Dedicated Schools Grant

Revenue Budget Summary	Month 4 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 3
Individual Schools Budget	145,013	145,013	-	0.00%	=
Early Years Block	49,347	48,962	(385)	-0.78%	↑
High needs Block (Excluding delegated to schools)	43,207	50,749	7,542	17.46%	↓
Exceptions & Central Services	2,787	2,793	6	0.22%	↑
Grant Income	(240,354)	(240,354)	-	0.00%	=
Brought Forward Deficit	(1,762)	-	1,762	100.00%	=
Total	(1,762)	7,163	8,925	506.53%	↓

Key Variances

The overall DSG position has worsened since TBM3 with significant adverse variances within High Needs Block budgets of the DSG. There are predicted in-year overspends across a range of budgets including mainstream and special schools top-up funding, external educational agency placements in independent non maintained schools, post-16 high needs provision and education other than at school. The overspends are predominantly being driven by increase in demand - the number of children with Education, Health and Care plans are continuing to go up by 12% per year, whilst unit costs are also increasing due to a rise in complexity of need. In line with government policy, the council is investing in early intervention and mainstream inclusion, however the benefits of this investment (reductions to higher cost placements) is unlikely to be seen until future years. The high needs block allocation received in 2026/27 is at a cash flat level with no uplift provided for growth or inflation factors.

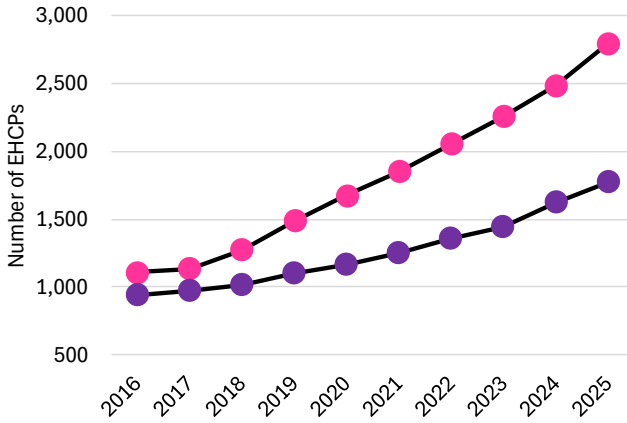
Risks & Mitigations

As is the case nationally, the high needs budgets are facing significant challenges largely linked to the ongoing increase in children with Education, Health and Care plans. Forecasts for high needs budgets in 2026/27 include an assumed level of in-year growth based on similar trends seen in recent financial years. At the end of the 2025/26 financial year there was a cumulative overspend of £1.762m on the central DSG. Currently, the government is providing legislation known as the Statutory Override facility that means any deficit associated with the Central DSG is excluded from the council's general fund. This facility runs until the end of 2027/28. The government's reforms include a proposal to fund 90% of central DSG deficits to the end of the 2025/26 financial year via a High Needs Stability Grant. At this stage, it is not clear whether a similar arrangement will apply for central DSG deficits arising in 2026/27 and 2027/28.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	-	-	-	-	-
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	-	-	-	-	-	-
Total	**-**	**-**	**-**	**-**	**-**	**-**

Number of Pupils with Education, Health and Care Plans



The graph shows the continual increase in pupils with EHCPs over a ten year period from 2016 to 2025. The number managed by Brighton and Hove has more than doubled over this timeframe with increases in the most recent years being at a higher rate than earlier in the time period.

Adult Social Care

Revenue Budget Summary	Month 4 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 3
Community Care - Physical & Sensory Support	32,095	39,649	7,554	23.54%	=
Community Care - Learning Disabilities	50,556	50,955	399	0.79%	=
Community Care - Memory & Cognition	11,547	11,781	234	2.03%	=
Community Care - Mental Health	13,507	15,783	2,276	16.85%	=
Assessment teams	14,850	14,928	78	0.53%	↓
In-house services	11,501	12,413	912	7.93%	↓
Commissioning & Partnerships	5,757	5,941	184	3.20%	↓
Total	139,813	151,450	11,637	8.32%	↓

Key Variances

The forecast for community Care is unchanged from TBM3 due to an imbalance of new client costs without the relevant health contributions invoiced to our health partners. The reconciliation of this area of spend will be reflected in TBM 5. For the other areas there is a net increase in forecasted overspend of £0.183m. The main increase this month of £0.128m for In-House Services is due to responsive repairs to hostels. The projected overspend on Community Care placement and packages of care totals £10.5m due to the number of clients being supported and the average unit cost of care being above budgeted levels. The total financial recovery plan for Adult Social Care totals £10.115m, with £6.341m achieved and £3.774m anticipated to be achieved and reflected in the forecast. ASC and Commissioning continue to implement and find new opportunities for financial sustainability which also aligns with regulatory CQC improvement journey.

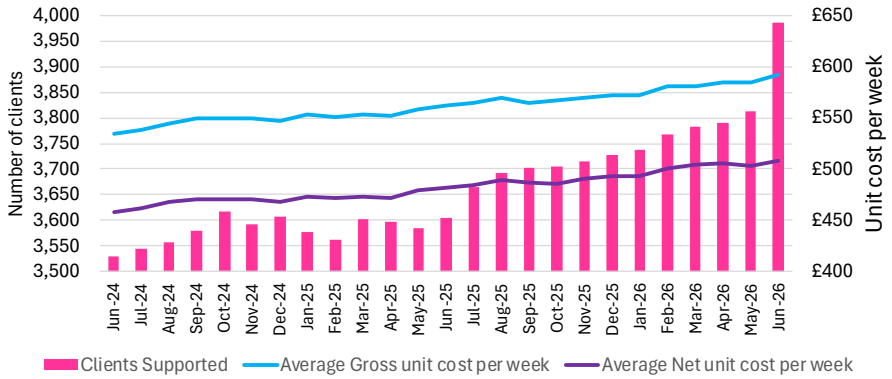
Risks & Mitigations

In 2025/26, the outturn for community care budgets was £6.8m overspent and the net uplift after savings for 2026/27 was £2.1m. The care required for the people related to this spend continue to require such support into 26/27, creating a structural overspend in the forecast. The Adult Social Care budget is facing significant challenges in mitigating the risks from increasing demands and managing the unit costs, where pressures in the independent sector continue to rise at a pace above general inflation.
In respect of financial recovery and the ongoing management of Community Care Budget pressures, a monthly savings and efficiencies meeting provides rigorous monitoring and oversight of the Adult Social Care & Health savings progress. Additionally, each month the top ten spends on placements and packages of care are reviewed to ensure immediate remedial action is undertaken to look at options and, wherever possible, reduce the cost of care whilst meeting assessed need.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings				23		**23**
Pressure mitigations						**-**
Transformation programmes			3,774	6,318		**10,092**
Total	**-**	**-**	**3,774**	**6,341**	**-**	**10,115**

ASC Community Care Demand and Unit Costs



The graph shows the significant increase in ASC clients support over the last 2 years (8% since June 2024) and the steady ongoing increase unit costs of care

Housing General Fund

Revenue Budget Summary	Month 4 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 3
HPS - Temp Accommodation (TA) and Allocations	14,641	15,084	443	3.03%	↑
HPS - TA Management & Support	804	654	(150)	-18.60%	↑
HPS - Rough Sleeper & Housing related Support	4,455	4,455	-	0.00%	↓
HPS - Travellers	397	441	44	11.07%	↓
H&I - Private Sector Housing	577	586	9	1.59%	=
H&I - Housing Strategy and Enabling	180	197	17	9.18%	↓
Total	21,054	21,417	363	1.72%	↑

Key Variances

The HGF position has improved by £0.031m since TBM3, reflecting continued progress in delivering the Temporary Accommodation (TA) Recovery Plan. Housing People Services (HPS) is forecasting an overspend of £0.336m. Housing & Investment (H&I) is forecasting an overspend of £0.026m. TA remains the most significant financial pressure within the service. However, the position continues to improve through delivery of the TA Recovery Plan and reduced reliance on high-cost accommodation. Between April and July 2026, 85 households were moved from higher cost accommodation, supporting improved financial performance.
The service also benefits from a forecast salary underspend of £0.150m due to recruitment delays.
Overall, the forecast reflects continued progress in reducing accommodation costs and delivering recovery plan actions.

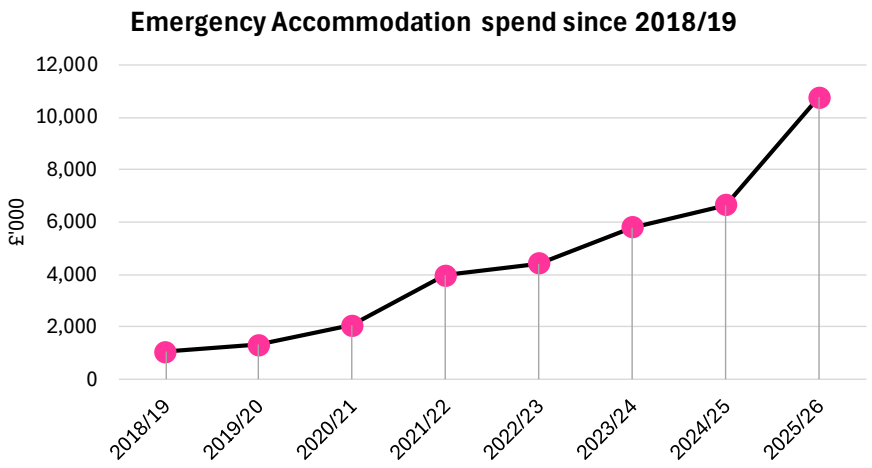
Risks & Mitigations

Temporary Accommodation remains the most significant demand-led financial pressure within the Housing General Fund, driven by sustained homelessness demand, rising accommodation costs and Housing Benefit subsidy loss. The Temporary Accommodation Recovery Plan continues to mitigate these pressures through reducing reliance on high-cost nightly paid accommodation, increasing lower-cost provision, supporting move-on to settled housing and delivering operational efficiencies. However, delivery of forecast savings remains dependent on property availability, mobilisation timescales and continued demand management.

Demand remains high, with accommodation pressures of £2.332m offset by forecast savings of £1.890m expected from the TA Recovery Plan.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	-	-	-	-	-
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	-	829	1,890	2,124	300	**5,143**
Total	**-**	**829**	**1,890**	**2,124**	**300**	**5,143**



The graph shows a rise in the use of emergency accommodation over time, reflecting increasing immediate housing need and reduced access to settled temporary options. There has also been a clear shift towards more expensive spot-purchased (nightly) accommodation, which remains the highest cost form of provision and continues to drive in-year pressure.
The forecast assumes a downward trend in costs as more cost-efficient accommodation is brought into use.

Appendix 1

Housing Revenue Account

Revenue Budget Summary	Month 4 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 3
Repairs & Maintenance	19,421	19,169	(252)	-1.30%	=
Housing Management & Support	6,933	6,888	(45)	-0.65%	=
Housing Investment & Asset Management	(124)	(434)	(310)	-250.00%	=
Housing Safety & Regulatory Compliance	3,807	4,116	309	8.12%	=
Housing Strategy & Supply	2,134	2,075	(59)	-2.76%	↓
Tenancy Services	17,534	18,000	466	2.66%	=
Council-owned Temporary Accommodation	200	834	634	317.00%	=
Rent & Service Charges	(78,919)	(78,919)	-	0.00%	↑
Capital Financing Costs	12,000	12,000	-	0.00%	=
Direct Revenue Funding	17,014	17,262	248	1.46%	=
Total	-	991	991	0.00%	↑

Key Variances

The forecast has improved by £0.467m compared with TBM3. This is due to improvement in void numbers reducing from 150 to 127 properties since April, supported by increased refurbishment activity and additional contractor capacity. Continued focus on reducing void turnaround times and sustaining tenancies should help reduce future rent loss and support the long-term financial position.

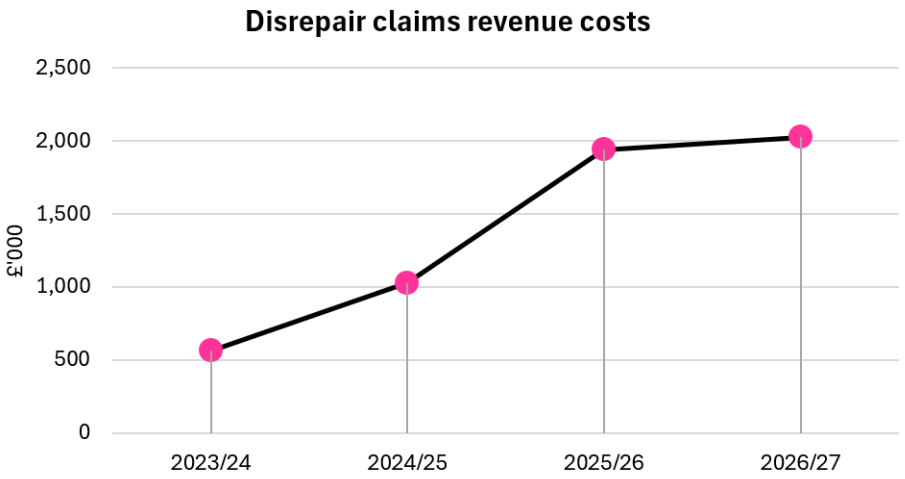
The HRA continues to face significant cost pressures, particularly from disrepair claims and associated repair costs, with forecast expenditure of £2.0m partially mitigated by a £1.0m earmarked reserve. The Repairs Service has implemented measures to reduce future liabilities, including reducing backlogs, addressing the root causes of defects and strengthening legal processes. Claims received are lower than at the same point last year.

Risks & Mitigations

The HRA continues to face significant financial challenges and uncertainty, with key risks including disrepair claims, building safety compliance, rent collection and void performance. While disrepair expenditure remains a major pressure, the service has implemented a range of proactive measures to reduce both the volume and long-term cost of claims. Claims received are lower than the same period last year, and work is underway to address root causes of defects, reduce outstanding cases, strengthen legal processes and improve tenant awareness. These measures have increased short-term repair expenditure but are expected to reduce future liabilities, improve customer satisfaction and support better value for money over the medium term.
The HRA will continue to closely monitor expenditure, income collection and emerging risks throughout the year.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	-	-	-	-	-
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	-	-	-	-	-	-
Total	**-**	**-**	**-**	**-**	**-**	**-**



This shows growth in revenue costs for disrepair claims, covering legal and professional fees and compensation. Costs of the disrepair works are charged to capital, given the nature of the works undertaken.

Appendix 1

City Operations Expenditure

Revenue Budget Summary	Month 4 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 3
City Infrastructure	46,986	48,754	1,768	3.76%	↓
Culture & Environment	20,668	21,329	661	3.20%	↓
Environmental Services	43,357	45,628	2,271	5.24%	↓
Place	5,146	5,066	(80)	-1.55%	↑
Digital Innovation	9,410	8,922	(488)	-5.19%	↑
Total	125,567	129,699	4,132	3.29%	↓

Key Variances

A key change from the month 3 report is further cost forecasts of £0.862m including agency usage associated within Environmental Services which are currently being reviewed in light of the Zero Missed Bins investment previously included.

There are some further expenditure reductions and vacancy underspends included accross City Operations.

All other expediture forecasts have been reviewed and there are no further key changes.

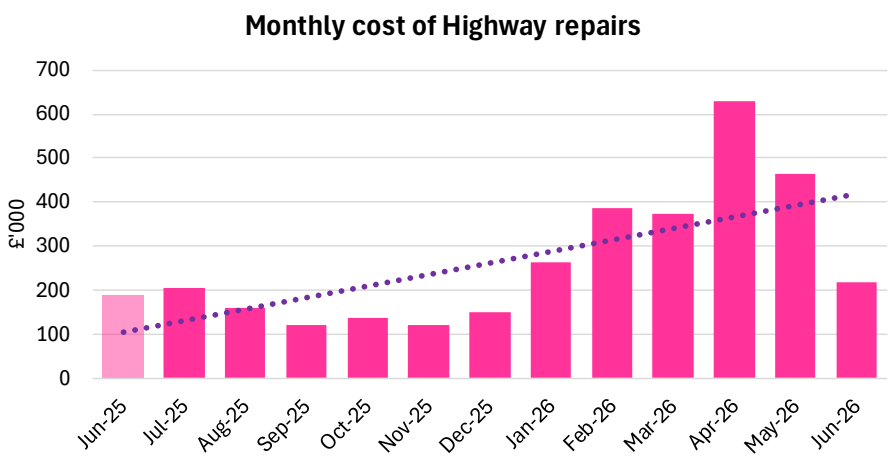
Risks & Mitigations

Previous risks reported have been reviewed and are still identified as risks. These include Concessionary Fares, with Compass moving to a claims basis and the forecast rising from £0.257m to £0.365m. Further risks include additional arboriculture disease work, extra collection resources, high agency spend, ageing fleet hire costs and no carry forward for project resource. Mitigations include reviewing vacant Building Control posts before adding resources.

There is a risk that the Highway repairs will increase further but is dependant on further adverse weather conditions which could impact repairs, particularly across the winter period.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	375	-	265	235	268	**1,143**
Pressure mitigations	-	-	-	-	-	**-**
Transformation programmes	-	-	110	-	60	**170**
Total	**375**	**-**	**375**	**235**	**328**	**1,313**



Forecast expenditure for the year is £3.2m based on spend incurred since April 2026 and assuming a spend profile for the remaining 9 months which is consistent with the same period in 2025/26. For comparative purposes June 25 has been included but not part of the forecast calculation.

City Operations Income

Revenue Budget Summary	Month 4 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 3
City Infrastructure	(53,320)	(53,909)	(589)	-1.10%	↑
Culture & Environment	(11,813)	(13,810)	(1,997)	-16.91%	↑
Environmental Services	(10,277)	(10,031)	246	2.39%	↑
Place	(2,562)	(2,273)	289	11.28%	↓
Digital Innovation	(180)	(122)	58	32.22%	=
Total	(78,152)	(80,145)	(1,993)	-2.55%	↑

Key Variances

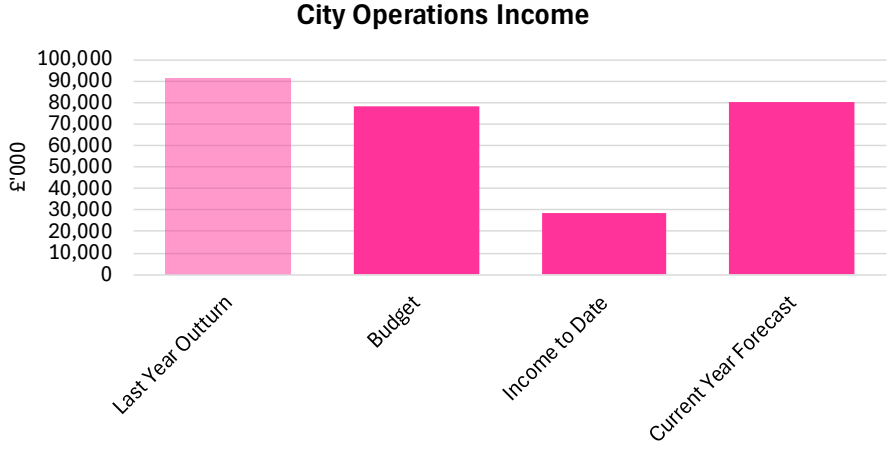
A key change from the month 4 report includes a reduction of Parking incomes reflecting actual usage over the year to date period. On-Street income is 6.6% up compared to last year, however the target is 8% based on the savings across the MTFS and much of this is weighted towards the summer. These will be under further review as the summer months continue. These have been mitigated within City Infrastructure through further incomes within Bus Shelter Advertising.
Building Control income forecasts have also reduced based on year to date actuals, but will also be kept under review.
There are other income improvements accross City Operations including Venues and revised forecasts within Commercial Waste. All other income forecasts have been reviewed and there are no further key changes.

Risks & Mitigations

Previous risks reported have been reviewed and are still identified as risks. These include parking and PCN income pressures. Savings at risk include Red Routes and paid parking in light-touch zones, both forecast at 50% achievement due to delays and challenge. Monitoring of Black Rock income remains important, as underachievement could increase in-year pressure.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	-	-	121	-	**121**
Pressure mitigations	-	-	-	-	-	**-**
Transformation programmes	220	433	343	2,792		**3,788**
Total	**220**	**433**	**343**	**2,913**	**-**	**3,909**



City Operations is showing £28.371m income received to date with an outturn forecast of £80.145m against an income target of £78.153m. Income may not always be linear and may have peak times during the year such as summer months or actioned through year end entries. Prior year income was £91.308m which included use of BSIP grant towards related expenditure. Year to date income will continue to be assessed for the reliability of the forecast position.

Central Hub

Revenue Budget Summary	Month 4 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 3
Cabinet Office	1,189	1,126	(63)	-5.30%	↑
Corporate Leadership Office	1,107	1,107	-	0.00%	=
Finance & WRBS	10,337	10,808	471	4.56%	↓
Property Estates	(4,873)	(3,859)	1,014	20.81%	↓
Property Other	9,670	9,104	(566)	-5.85%	↑
Governance & Law	5,008	4,698	(310)	-6.19%	↑
People & Innovation	6,160	6,176	16	0.26%	↑
Contribution to Orbis	3,139	3,139	-	0.00%	=
Total	31,737	32,299	562	1.77%	↑

Key Variances

The Directorate's position improved by £0.230m at TBM4, mainly due to a combination of mitigations within Facilities and Building Services and Strategic Communications and Engagement, together with £0.245m from staffing cost savings and £0.098m from contract reviews. The most significant pressure is in Finance and Property Services with a net pressure of £1.036m, driven by lost rental income and landlord related charges and costs on vacant properties as well as staffing and operational costs Pressure in WRBS , £0.287m. This has been partly offset by an expected income overachievement of £0.400m within the Surveying Team, resulting from increased SEND and direct commission projects. There have been only minor changes across other services, with Governance and Law and the Cabinet Office maintaining forecast underspends of £0.310m and £0.063m respectively. These underspends are mainly attributable to income overachievement and savings in operational expenditure.

Risks & Mitigations

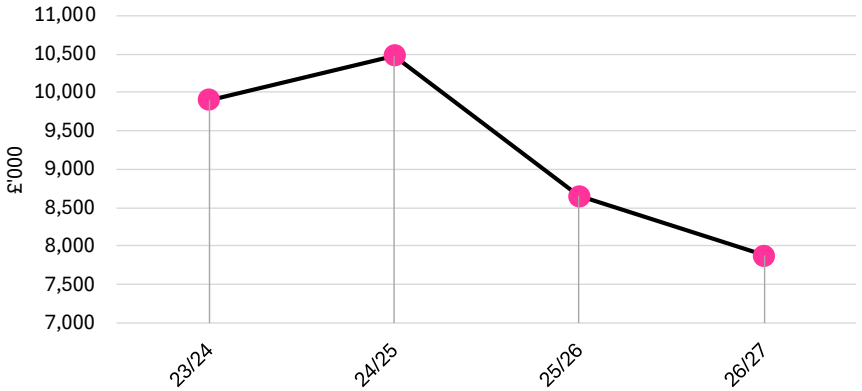
Key risks remain across Central Hub budgets, particularly within Property, WRBS and enabling services. Property maintenance and landlord related costs may increase as the number of vacant properties rises and unforeseen works are required. The most significant risks currently relate to rental income shortfalls and the reliance on additional Surveying income and new projects to help mitigate the financial position.

Legal, Finance, HR and Procurement services also remain under pressure, requiring additional capacity to support council wide transformation activity. There is also an unquantified risk associated with any responsive repairs activity to council assets that may be required across the city during the year.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	-	614	798	213	**1,625**
Pressure mitigations	-	-	-	-	-	**-**
Transformation programmes	300	-	535	200	10	**1,045**
Total	**300**	**-**	**1,149**	**998**	**223**	**2,670**

Annual commercial rental income



2025/26 saw the closure of New England House reducing the commercial income generated by c.£900k. Other factors for the reduced income relates to the disposal of properties to achieve a capital receipt, void properties or rent reductions as a consequence or lease renewals or new lettings.

Centrally-held Budgets

Revenue Budget Summary	Month 4 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 3
Bulk Insurance Premia	4,565	4,665	100	2.19%	=
Capital Financing Costs	13,453	13,906	453	3.37%	=
Levies & Precepts	258	258	-	0.00%	=
Unallocated Contingency & Risk Provisions	3,535	3,535	-	0.00%	=
Unringfenced Grants	(15,000)	(15,000)	-	0.00%	=
Housing Benefit Subsidy	3,099	3,520	421	13.59%	=
Other Corporate Items	6,897	8,475	1,578	22.88%	=
Total	16,807	19,359	2,552	15.18%	=

Key Variances

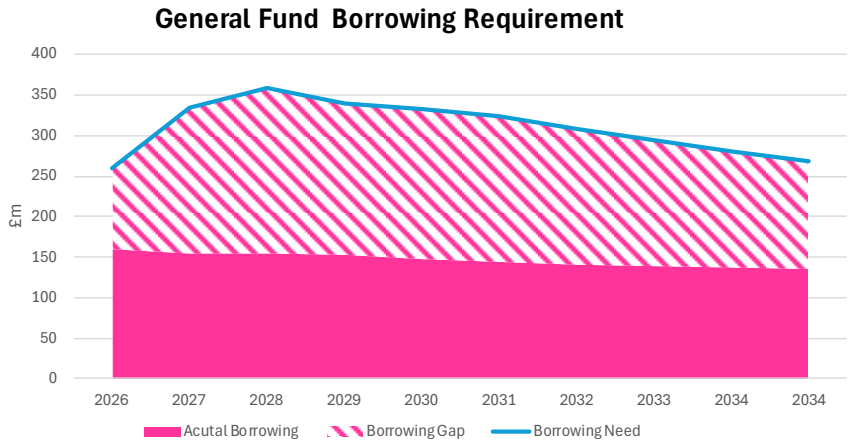
TBM 04 update. The Housing Benefit Subsidy budget has been overspent for several years. £2.000m pressure funding was included in 2026/27 to fund these rising costs. Whilst TBM4 forecast remains the same, Housing Benefit data indicates a potential increase in pressure. This is being investigated and reported as a risk, with further updated expected in TBM5. A recovery plan is in place to reduce the Housing Benefit Subsidy loss. This is expected to reduce the pressure by £0.240m by year end. Other mitigations in the recovery plan may also see other, smaller movements. The financing cost budget overspend remains at £0.453m, driven by higher borrowing costs and the use of borrowing in place of up to £17m of capital receipts to fund transformation activity. Under Other Corporate Items there is no change from TBM3 with £0.946m for pay award offer and £0.730m pressure due to Business Rates Retention.

Risks & Mitigations

A Housing Benefit Subsidy Recovery Action Plan is in place to minimise the Housing Benefit subsidy loss. The primary way to achieve this is by loss-inducing Supported Accommodation providers gaining "registered" status. At least one provider is expected to achieve this in 2026/27, which has been included in the forecast. Other activities are also underway such as improving knowledge around housing benefit subsidy loss in relation to claims for providers and the voluntary and community sector, maximising powers under the Supported Housing (Regulatory Oversight) Act, and reviewing commissioned supported accommodation

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	-	450	1,550	-	**2,000**
Pressure mitigations	-	-	-	-	-	**-**
Transformation programmes	1,125	-	-	-	-	**1,125**
Total	**1,125**	**-**	**450**	**1,550**	**-**	**3,125**



The graph shows the funding gap between the need to borrow to support the capital programme versus the actual borrowing portfolio. The general fund has a gap of up to £180m in 2026/2 which will be met by a combination of using the cash from internal reserves, and external borrowing.

Area	Risk Month 4 £'000	Explanation of Key Risks
Family Help & protection	1,200	Risk that financial recovery measures will not be realised in demand led budgets due to factors beyond the control of the service.
Total Families, Children & Wellbeing	**1,200**	
Adult Social Care - Community Care	4,283	Insufficient growth allowed for demand in the remainder of the financial year
Adult Social Care	3,774	Risk of anticipated savings not reducing forecast spend due to increasing demand
Housing	2,719	Risk of anticipated savings not reducing forecast spend due to increasing demand
Fuel prices and Utility costs	28	The projected risk reflects general fund costs and doesn't include: - £0.263m projected for the Housing Revenue Account - additional costs related to specific contracts
Total Homes & Adult Social Care	**10,804**	
Utilities and Fuel	391	Inflation risk related to the cost of utilities (6%) and fuel (30%) based on the current forecast.
Total City Operations	**391**	
Utilities and Fuel	134	Inflation risk related to the cost of utilities (6%) and fuel (30%) based on the current forecast.
People & Innovation - Facilities	435	Risk of not realising the full savings for landlord service costs and PMB in Facilities and Building Services from the sale of commercial and operational properties
Welfare, Revenues & Benefits	120	Risk of increased agency costs for dealing with the backlog of Council Tax queries.
Total Central Hub	**689**	
Sub Total	**13,084**	
Other Corporate Items	1,200	Potential costs following the consultation on the closure of Middle Street Primary school and the Merger of Stanford infant and Junior schools.
Other Corporate Items	1,125	There is a risk associated with not realising savings from Organisational Change programme.
Housing Benefit Subsidy	1,540	Risk of increase in Housing Benefit Subsidy losses. A detailed review of the data will ensure a robust forecast is provided for TBM5.
Total Centrally-held Budgets	**3,865**	
Total General Fund	**16,949**	

Appendix 3 - Innovation & Transformation Portfolio Savings Dashboard – TBM4:

The Innovation & Transformation portfolio delivers £74.4m of the £93m savings target within the four-year Medium Term Financial Strategy. Savings performance is tracked through BGRAG ratings: Blue (delivered), Grey (in development), Red (high risk), Amber (managed risk), and Green (on track). The savings rating shown represents the dominant status within each programme. The delivery rating represents a balanced view of the Senior Responsible Owner of programme status and delivery confidence tracked through a RAG rating.

Strategic programme name	Savings target across MTFS	Savings BGRAG rating 2026/27	Delivery RAG rating	Key risks/issues/dependencies
Adult Social Care Transformation	£23.592m	Green	Amber	95 care providers have applied for annual fee uplifts. To maintain statutory responsibilities regarding value for money and market stability, we may have to agree some of the requests, adversely impacting upon the savings delivery.
Families, Children & Wellbeing Transformation	£6.875m	Amber	Amber	Demand led placement savings remain a challenge. The regionalisation of fostering is not achieving the required savings but is key to impacting residential savings. Home to School Transport remains an area of concern, with the directorate developing proposals.
Homes & Homelessness	£10.587m	Amber	Amber	Additional procurement capacity needed to accelerate progress. Consideration needed as to whether to increase the size of the corporate Procurement Team versus services buying in short term capacity.
Procurement, Commissioning & Contract Management	£4.00m	Not applicable	Red	Small reductions in contract spend will not generate the scale of required savings. Important to target key contracts and apply more bold and innovative approaches to procurement. Capacity remains a challenge.
Income & Commercialisation	£10.213m	Amber	Amber	Capacity challenges across corporate services is impacting the speed at which work can be driven forward.
Asset Strategy (operational)	£3.023m	Amber	Red	Methodology has been developed by Finance to calculate operational savings following building disposals.
Asset Strategy (capital target, not included in the total of £74.4m)	£57.691m	Green	Green	Decisions will be required in the autumn regarding disposals recommended by the external consultant. This will include decisions around operational buildings and staff location.
Organisational Transformation	£7.21m	Amber	Red	Importance of connecting the strategic programme's deliverables with the work on LGR. Programme team being recruited in order to mitigate capacity issues and manage double counting of savings risks.
Digital Innovation & Technology	£8.914m	Not applicable	Amber	Temporary capacity challenges in IT&D have introduced some minor delays. Currently working with directorates to obtain reliable operational data to support business cases development. Managing the risk around not double-counting savings.

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